

EXHIBIT 61

Plaintiff's

Responses to

Second Set of

Requests for

Admissions

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS	:	CIVIL ACTION
	:	
Plaintiff,	:	NO. 2:19-cv-05030-JDW
	:	
-vs-	:	
	:	
THE MIDDLE EAST FORUM, et al.	:	
	:	
Defendants.	:	

**PLAINTIFF LISA BARBOUNIS'S RESPONSES
TO DEFENDANTS' SECOND SET TO REQUESTS FOR ADMISSIONS**

1. REQUEST FOR ADMISSION NO. 1: Admit that you left your hotel in Washington, DC to attend dinner at Cuba Libre Restaurant in Washington, DC with Gregg Roman and Matthew Bennett on March 4, 2018.

RESPONSE:

It is admitted that Plaintiff, Lisa Barbounis was in Washington D.C. for the AIPAC Conference in March 2018. It is admitted that Plaintiff, Lisa Barbounis was required to attend AIPAC Conference events as part of her job responsibilities for MEF. One of these events was an MEF sponsored dinner at the Cuba Libre Restaurant in Washington D.C. There were between thirty (30) to fifty (50) people in attendance including donors to the MEF sponsored event and Plaintiff was one of these individuals. Plaintiff was required to attend and worked that evening entertaining and greeting donors. Plaintiff was tasked with giving donors one-on-one time. There were about six tables booked for the event and Plaintiff sat at one of these tables. Plaintiff did not sit with Greg Roman or Matthew Bennett.

2. REQUEST FOR ADMISSION NO. 2: Admit that you drank alcoholic beverages at Cuba Libre Restaurant in Washington, DC with Gregg Roman and Matthew Bennett on March 4, 2018.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa

Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

The MEF sponsored dinner was held at a restaurant that served alcohol. Plaintiff had a drink with dinner. The entire event was paid for by The Middle East Forum.

3. REQUEST FOR ADMISSION NO. 3: Admit that at some point after dinner you went to the hotel bar at the Henley Park Hotel in Washington, DC with Gregg Roman and Matthew Bennett on March 4, 2018.

RESPONSE:

Admitted in part. It is admitted that after the MEF sponsored dinner during the AIPAC Conference, Plaintiff, Lisa Barbounis attended an AIPAC event at the Henley Park Hotel. There was hundreds of attendees present and Plaintiff was required to attend the event as part of her job responsibilities for MEF. Matthew Bennett and Greg Roman also attended the event.

4. REQUEST FOR ADMISSION NO. 4: Admit that you drank alcoholic beverages at the hotel bar at the Henley Park Hotel in Washington, DC with Gregg Roman and Matthew Bennett on March 4, 2018.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

It is admitted that alcohol was served at the AIPAC event at the Henley Park Hotel. Plaintiff may have had one drink if any.

5. REQUEST FOR ADMISSION NO. 5: Admit that sometime between 12am and 1am, after the Henley Park Hotel, you went to Penn Social bar in Washington, DC with Gregg Roman and Matthew Bennett on March 5, 2018.

RESPONSE:

It is admitted that Plaintiff attended two AIPAC events after the MEF sponsored dinner as part of her job responsibilities for MEF. Plaintiff was required to attend these events as part of her job responsibilities for MEF. There were over a hundred people at the second event. It is admitted that Plaintiff, Lisa Barbounis may have had a drink at the second event. Alcohol was served at the event. Plaintiff Lisa Barbounis was working during the event talking with grantees and fellows.

6. REQUEST FOR ADMISSION NO. 6: Admit that you drank alcoholic beverages at Penn Social bar in Washington, DC with Gregg Roman and Matthew Bennett on March 5, 2018

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

See Plaintiff's Response to Request for Admission Number 5, above. Plaintiff attended the event as part of her job responsibilities for MEF. Plaintiff does not recall having drinks with Matthew Bennett and Greg Roman, however, the MEF staff attended the event and alcohol was served. Plaintiff did not spend time with Greg Roman and Matthew Bennett at the second event as Plaintiff spoke with an MEF fellow she was introduced to that evening.

7. REQUEST FOR ADMISSION NO. 7: Admit that at some point after Penn Social bar you went to the back to the AirBNB in Washington, DC with Gregg Roman and Matthew Bennett on March 5, 2018.

RESPONSE:

It is admitted that Plaintiff, Lisa Barbounis, Patricia McNulty , Marnie Meyer, three guests from Pinskey, Raheem Kasam, and another individual were ordered back to an AirBnB by Director of the Middle East Forum, Greg Roman. Plaintiff, Lisa Barbounis informed Defendant, Greg Roman that Plaintiff, Lisa Barbounis was going to go back to her hotel room. Defendant, Greg Roman aggressively ordered Plaintiff, Lisa Barbounis to get in an Uber which was driven to Defendant, Greg Roman's Airbnb. It was at this Airbnb that Director of the Middle East Forum, Defendant, Greg Roman sexually assaulted Plaintiff's coworker, Patricia McNulty. Plaintiff, Lisa Barbounis was seated on the sofa next to Defendant, Greg Roman when he put his hands underneath Patricia McNulty and dragged her onto his lap and began whispering in her ear. Defendant, Greg Roman also put his hands on Plaintiff, Lisa Barbounis, which was an unwelcome and inappropriate touching of Plaintiff, Lisa Barbounis.

8. REQUEST FOR ADMISSION NO. 8: Admit that you drank alcoholic beverages at the same AirBNB in Washington, DC with Gregg Roman and Matthew Bennett on March 5, 2018.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

Denied. Defendant, Greg Roman tried to get everyone present to smoke illegal drugs, to wit, marijuana while at the Airbnb. Defendant, Greg Roman pulled out a box filled with different types of an illicit, illegal drug and offered it to Plaintiff, Lisa Barbounis and others. Plaintiff Lisa Barbounis declined and did not drink either.

9. REQUEST FOR ADMISSION NO. 9: Admit that Marnie Meyer was at the same AirBNB in Washington, DC with Gregg Roman and Matthew Bennett on March 5, 2018.

RESPONSE:

See Plaintiff's Response to Request for Admissions Number 7, above.

10. REQUEST FOR ADMISSION NO. 10: Admit that you slept at the same AirBNB in Washington, DC that Gregg Roman and Matthew Bennett slept at on March 5, 2018.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

It is admitted that Plaintiff, Lisa Barbounis fell asleep on the couch at the Airbnb.

11. REQUEST FOR ADMISSION NO. 11: Admit that while you were employed by The Forum you made inappropriate sexual comments regarding Gregg Roman while you were working on the job.

RESPONSE:

Denied.

12. REQUEST FOR ADMISSION NO. 12: Admit that on March 8, 2019, you asked Gregg Roman, to return to work with you directly as Director of The Forum.

RESPONSE:

Plaintiff, Lisa Barbounis does not understand the Request for Admission presented. Specifically, Plaintiff, Lisa Barbounis does not understand what is meant by the phrase: "directly as Director

of The Forum.” Accordingly this Request is denied as stated. It is admitted that Plaintiff, Lisa Barbounis spoke to Daniel Pipes about Defendant Greg Roman’s return to work at Director of The Middle East Forum. Plaintiff, Lisa Barbounis expressed reservations about Defendant, Greg Roman’s return and Daniel Pipes agreed to allow Defendant, Greg Roman to return with strict safeguards for the safety of the female staff. Unfortunately, Daniel Pipes did not adhere to the agreed to safeguards and Defendant, Greg Roman continued his campaign of retaliation post return.

13. REQUEST FOR ADMISSION NO. 13: Admit that you did not have a contract to be employed with The Forum for any length of time.

RESPONSE:

Defendant seeks Plaintiff to admit to a legal conclusion that Plaintiff, Lisa Barbounis was an at-will employee. Plaintiff objects to a Request for Admission that seeks a pure legal conclusion.

14. REQUEST FOR ADMISSION NO. 14: Admit that you were employed as an at-will employee with The Forum.

RESPONSE:

Defendant seeks Plaintiff to admit to a legal conclusion that Plaintiff, Lisa Barbounis was an at-will employee. Plaintiff objects to a Request for Admission that seeks a pure legal conclusion.

15. REQUEST FOR ADMISSION NO. 15: Admit that The Forum did not fire you.

RESPONSE:

Denied. Plaintiff’s unlawful discharge from The Middle East Forum was not voluntary. Plaintiff was constructively discharged from her employment because the work conditions were so abusive, onerous, and hostile that no reasonable person in Plaintiff’s position would have been expected to continue working such that Plaintiff’s resignation was void of free will.

16. REQUEST FOR ADMISSION NO. 16: Admit that you voluntarily resigned from The Forum.

RESPONSE:

See Plaintiff’s Response to Request for Admissions Number 15, above.

17. REQUEST FOR ADMISSION NO. 17: Admit that one reason you resigned from The Forum was your political activity, which caused The Forum to place limits on your public participation in overseas electoral activity.

RESPONSE:

Denied. Plaintiff was constructively discharged from The Middle East Forum. See Plaintiff's Response to Request for Admissions Number 15, above.

18. REQUEST FOR ADMISSION NO. 18: Admit that prior to the time you left The Forum, Defendant spoke with you several times about your unsanctioned political activity in the United Kingdom.

RESPONSE:

Admitted in part. It is admitted that Plaintiff, Lisa Barbounis requested permission from The Middle East Forum to work with in individual named Tommy Robinson. Daniel Pipes and Defendant, Greg Roman both approved Plaintiff's request. Plaintiff, Lisa Barbounis was introduced to Tommy Robinson as part of Plaintiff's job responsibilities for The Middle East Forum. It is admitted that The Middle East Forum had no problem with Plaintiff, Lisa Barbounis's work with Tommy Robinson until after Plaintiff, Lisa Barbounis reported Defendant, Greg Roman's sexual assault and severe and pervasive discrimination and harassment in the workplace. One of the times when Plaintiff reported Defendant, Greg Roman's sexual harassment was in November 2018.

19. REQUEST FOR ADMISSION NO. 19: Admit that The Forum asked you not to participate in political campaigns because of the threat to The Forum's non-profit status.

RESPONSE:

It is admitted that Defendant, The Middle East Forum and specifically Daniel Pipes admonished Plaintiff's public exposure in working with Tommy Robinson. Notwithstanding, Defendants provided approval for Plaintiff to work with Tommy Robinson as long as Plaintiff did it on her own time. Daniel Pipe's admonishment came after Plaintiff reported Defendant, Greg Roman's sexual assault and discrimination and harassment in the workplace. Daniel Pipes made inappropriate comments to Plaintiff, Lisa Barbounis about her appearance.

20. REQUEST FOR ADMISSION NO. 20: Admit that participating in political activity can threaten The Form's status as a 501(c)(3) entity.

RESPONSE:

Objection. Defendants Request seeks a pure legal conclusion.

21. REQUEST FOR ADMISSION NO. 21: Admit that prior to the time you left The Forum, you were looking for apartments in Washington DC.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

Plaintiff does not recall whether she began looking for an apartment in Washington D.C., before she left The Middle East Forum. Plaintiff had a job in Washington D.C., and had to find a place to stay while Plaintiff was in Washington D.C., doing her job. Plaintiff began looking for an apartment sometime around the time when Plaintiff was constructively discharged from her employment.

22. REQUEST FOR ADMISSION NO. 22: Admit that you searched for new employment prior to filing your Complaint against Defendants.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is

entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

The Complaint speaks for itself and was filed in October 2019. At the time Plaintiff filed her Complaint, Plaintiff was working in Washington D.C. for Congressman Weber.

23. REQUEST FOR ADMISSION NO. 23: Admit that you shared and/or provided information about your Complaint with your current employer.

RESPONSE:

Denied as stated. Plaintiff did not mention her complaint until Defendants served Plaintiff at her place of business in front of Plaintiff's coworkers and supervisors. Plaintiff shared as little information as possible in order to explain the interruption from work. Importantly, Defendants had already effected service when Defendants chose to serve Plaintiff a second time in Washington D.C., at Plaintiff's place of business.

24. REQUEST FOR ADMISSION NO. 24: Admit that you have never been a confidential informant or paid by the FBI.

RESPONSE:

Objection. Plaintiff is not going to respond to Requests that are designed to embarrass and harass.

25. REQUEST FOR ADMISSION NO. 25: Admit that you do not believe it is inappropriate to date married men.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of

Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

26. REQUEST FOR ADMISSION NO. 26: Admit that you have dated at least one married man in the last five (5) years.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

27. REQUEST FOR ADMISSION NO. 27: Admit that you were involved in an extramarital affair between 2018-2019.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

28. REQUEST FOR ADMISSION NO. 28: Admit that you shared information about your extramarital affair with other employees and/or contractors of The Forum.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

29. REQUEST FOR ADMISSION NO. 29: Admit that you sustained a contusion around your eye while engaged in an extramarital encounter in Europe.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

30. REQUEST FOR ADMISSION NO. 30: Admit that you were involved in an extramarital affair with Daniel Thomas, also known as Danny Tommo.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

31. REQUEST FOR ADMISSION NO. 31: Admit that you oversaw a \$25,000 grant from The Forum's philanthropic fund to Daniel Thomas, and requested additional funds for him.

RESPONSE:

Denied as stated. Plaintiff oversaw a project where The Middle East Forum provided a grant to Daniel Thomas for an ideological demonstration to free an individual with whom the Forum wanted to help named Tommy Robinson. This was the first time that Plaintiff had occasion to know about Tommy Robinson. Plaintiff was put in charge of this assignment and reported to Defendant, Greg Roman about Plaintiff's progress. Defendant, Greg Roman actually oversaw the project as Plaintiff reported to Defendant, Greg Roman. Plaintiff made no decisions without Defendant, Greg Roman's approval and any recommendation that Plaintiff made was in the interest of objectives provided to Plaintiff by Defendant, Greg Roman and The Middle East Forum. Plaintiff believes that The Middle East Forum ended up making a grant of \$32,000.00.

32. REQUEST FOR ADMISSION NO. 32: Admit that you served as Director of Communications for Tommy Robinson.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

Admitted in part. Plaintiff was asked to volunteer and help Tommy Robinson and held herself out as his Director of Communications. Plaintiff sought and received approval from Daniel Pipes and Defendant, Greg Roman prior to working with Tommy Robinson. Defendants provided their approval on the condition that Plaintiff work with Tommy Robinson on her own time.

33. REQUEST FOR ADMISSION NO. 33: Admit that you used The Forum's resources that you had access to as Director of Communications to assist Tommy Robinson's May 2019 election campaign to be a Member of European Parliament.

RESPONSE:

Denied.

34. REQUEST FOR ADMISSION NO. 34: Admit that you discussed with others the money you were going to make from this lawsuit.

RESPONSE:

Denied.

35. REQUEST FOR ADMISSION NO. 35: Admit that you discussed with others that you did not have much of a case but you knew The Forum always settles lawsuits.

RESPONSE:

Denied.

36. REQUEST FOR ADMISSION NO. 36: Admit that you are not seeking to recover future medical expenses in this lawsuit.

RESPONSE:

Denied.

37. REQUEST FOR ADMISSION NO. 37: Admit that you have received payment from a health insurance carrier for all of the past medical expenses for which you seek recovery in this lawsuit.

RESPONSE:

Denied.

38. REQUEST FOR ADMISSION NO. 38: Admit that you are not pleading a cause of action for intentional infliction of mental distress in this lawsuit.

RESPONSE:

Objection. The Complaint speaks for itself. Moreover this Request seeks a legal conclusion.

39. REQUEST FOR ADMISSION NO. 39: Admit that you are not pleading a cause of action for libel in this lawsuit.

RESPONSE:

Objection. The Complaint speaks for itself. Moreover this Request seeks a legal conclusion.

40. REQUEST FOR ADMISSION NO. 40: Admit that you are not pleading a cause of action for defamation in this lawsuit.

RESPONSE:

Objection. The Complaint speaks for itself. Moreover this Request seeks a legal conclusion.

41. REQUEST FOR ADMISSION NO. 41: Admit that you are not pleading a cause of action for slander in this lawsuit.

RESPONSE:

Objection. The Complaint speaks for itself. Moreover this Request seeks a legal conclusion.

DEREK SMITH LAW GROUP, PLLC

By: /s/ Seth D. Carson
SETH D. CARSON
Derek Smith Law Group, PLLC
1835 Market St, Ste 2950
Philadelphia, PA 19103
P: 215-391-4790
E: seth@dereksmithlaw.com
Attorneys for Plaintiff
Lisa Barbounis

DATED: April 7, 2020

CERTIFICATE OF SERVICE

I hereby certify that on this date that I caused a true and correct copy of Plaintiff's Responses to Defendants' Requests for Admissions to be served via email to:

David J. Walton (PA # 86019)
Leigh Ann Benson (PA #319406)
Cozen O'Connor
1650 Market Street, Suite 2800
Philadelphia, PA 19103
P: 215-665-2000
F: 215-665-2013
dwalton@cozen.com
lbenson@cozen.com

DEREK SMITH LAW GROUP, PLLC

BY: /s/ Seth D. Carson
SETH D. CARSON

DATED: April 7, 2020

EXHIBIT 62

Message

Confirming

Promotion of P.

McNulty

Re: Bennett speaking for MEF March 24

Tricia McNulty <McNulty@meforum.org>

Tue 3/5/2019 3:18 PM

To: EJ Kimball <Kimball@meforum.org>; Lisa Barbounis <Barbounis@meforum.org>

EJ,

I will be away from March 17-24 and our Development team is now down to two (just me and Caitriona) so please be aware that you and others are really going to need to pick up a lot of responsibility to make this happen. We are heavy into Gala planning and I am now taking over as acting director of development in Matt's absence. We are stretched beyond thin.

I will start looking into a venue space. Please be as detailed as possible with what you are looking to have. Is this theatre style? Two podiums at the front with microphones, or will they be seated? Note that chairs like what we had at Qatar were rented furniture brought in and costly.

You want just a cheese board displayed for 100 people for the food? Wine passed or a stationary bar serving just wine?

I will need a topic title and blurb drafted for what Bennett will be talking about that evening and a better outline of what the evening will look like in order to draft an invitation.

Tricia McNulty

Program Manager

Middle East Forum

Phone: (215) 546-5406 ext. 110

Email: McNulty@MEForum.org

Fax: (215) 546-5409

www.MEForum.org

The Middle East Forum is a publicly supported, 501(c)3 nonprofit organization, working to promote American interests and protect Western values. Your support helps us further our mission of educating Americans about the Middle East and influencing U.S. policy towards that region.

From: EJ Kimball

Sent: Tuesday, March 5, 2019 2:48 PM

To: Tricia McNulty; Lisa Barbounis

Subject: Bennett speaking for MEF March 24

Hi, Gregg confirmed to me that Naftali Bennett will speak for 30 minutes at a MEF event around the AIPAC conference.

Gregg is going over some details with Bennett's people in Israel but the basic idea is as follows:

Event from 6-730pm, Bennett will speak for 30 minutes in a format that we can decide (perhaps a guided discussion w/ DP?). I will invite Members of the CIVC, if they are in town, to speak as well before Bennett.

We will serve wine and cheese and aim for about 100 people. Filling space should be no problem with the # of VIPs in town for the conference.

We will need to secure a venue that is near the Convention Center. I'm not familiar with the venues nearby. Tricia, do you have the bandwidth to look into it? I'm thinking of a conference room in a hotel or something that can accommodate seating for 100 people.

I'm not sure the full budget for this, and I'm sure the venue will drive that discussion. Lisa, are you familiar with any places near the Convention Center?

EJ Kimball
Director, Israel Victory Project
Middle East Forum
202-821-6091

EXHIBIT 63

Email to Plaintiff from M. Fink

Meeting Summary; Moving Forward

Marc Fink <fink@meforum.org>

Sun 3/10/2019 1:58 PM

To: Lisa Barbounis <Barbounis@meforum.org>

Cc: Daniel Pipes <pipes@meforum.org>

Hi Lisa,

Thank you for attending the meeting Saturday, and expressing your opinions on how best to move forward as an organization.

Would you please send me by COB Monday: (i) a summary of the understandings you feel we reached during the meeting; (ii) your proposal for when, and under what circumstances, Gregg would access/use the office moving forward; (iii) your proposal for when, and under what circumstances, you would interact with Gregg on Forum business outside the office (days, times, means of communication, etc.).

Thank you,

Marc

Meeting Summary and Moving Forward

Marc Fink <fink@meforum.org>

Sun 3/10/2019 1:56 PM

To: Tricia McNulty <McNulty@meforum.org>

Cc: Daniel Pipes <pipes@meforum.org>

Hi Tricia,

Thank you for attending the meeting Saturday, and expressing your opinions on how best to move forward as an organization.

Would you please send me by COB Monday: (i) a summary of the understandings you feel we reached during the meeting; (ii) your proposal for when, and under what circumstances, Gregg would access/use the office moving forward; (iii) your proposal for when, and under what circumstances, you would interact with Gregg on Forum business outside the office (days, times, means of communication, etc.).

Thank you,

Marc

Barbounis Response to Fink E-mail – 3-11-2019

From: Lisa Barbounis
Sent: Monday, March 11, 2019 6:38 PM
To: Marc Fink
Cc: Daniel Pipes
Subject: Re: Meeting Summary; Moving Forward

(i)

Gregg Roman will be reinstated as Director of MEF. He will maintain responsibility for Projects, Development and Communications - anything content/production related. He will have no oversight of finance operations.

His position as director will remain probationary for at least the first year until Dr. Pipes regains confidence in his behavior.

(ii)

Gregg will be able to access the office when Dr. Pipes is present or when he is invited to a meeting. Should he wish to work from the office he will have to give staff prior notice.

(iii)

I will resume full communication with Gregg Roman via email, phone and telegram during normal business hours. After hours and via email or telegram reserved for urgent matters.

McNulty Response to Fink E-mail – 3-11-2019

From: Tricia McNulty
Sent: Monday, March 11, 2019 5:15 PM
To: Marc Fink
Cc: Daniel Pipes
Subject: Re: Meeting Summary and Moving Forward

Dear Marc,

Please find my response to each item below:

(i) My understanding of the meeting outcome is that Gregg will serve as the Forum's Director once again, with certain parameters in place. At a minimum, the first six months will be essentially a probationary period, with Daniel looking over Gregg's shoulder to be sure no improprieties are being made.

Finances will continue to report directly to Daniel but Gregg will again be collaborating with the Director of Communications and Director of Development.

Gregg knows that those in the office are allowed to talk to Daniel directly at any time should they wish to raise concerns and that, unlike before, there can be no directive to not discuss anything with Daniel.

Gregg will not have hiring/firing power on his own but may make suggestions to Daniel. Ultimately, Daniel approves all hiring and firing.

Should Gregg want to give directives or projects to working team members of an MEF department, those directives should first be discussed with the director of that department.

There has been a noticeable difference in the working relationship with Gregg in the past four months and the understanding moving forward is that this will continue. He will, as he has done in the past four months, collaborate and listen to those he is working along side, while providing much needed direction to keep all departments of the Forum working as a cohesive mechanism.

(ii) I think that there should be no problem with Gregg being in the office 1-2 days a week with advanced notice as to what those days will be. I think that for the comfort of both him and everyone in the office, advanced notice is necessary. It did not seem like Gregg actually wanted to be in the office at all, so if he prefers to only be in the office when Daniel is there I see no problem with that either.

(iii) When Gregg is not in the office he can contact myself by office phone, cell phone calls (not text message), email, or telegram, Monday-Friday 9-5. Outside of standard business hours he can contact by email and telegram when items are time sensitive.

EXHIBIT 64

Deposition of Caitriona Accardi

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
CIVIL ACTION

- - -

LISA BARBOUNIS,	:	
	:	
Plaintiff,	:	NO. 2:19-cv-05030-JDW
	:	
vs.	:	
	:	
MEF, et al,	:	
	:	
Defendants.	:	

- - -

Tuesday, February 2, 2021

- - -

Videotaped deposition of CAITRIONA ACCARDI,
taken remotely via Zoom video conference pursuant to
Notice, beginning at 2:10 p.m. before Charlotte F.
Marshall, a Court Reporter and Notary Public in and for
the Commonwealth of Pennsylvania, appearing remotely
from Bucks County, Pennsylvania.

- - -

1 know Daniel was mad about (audio problems) she was
2 doing after like a month of her being in that role but
3 again, she didn't have background in that role. So
4 I -- like -- any normal person would probably need a
5 little bit more time to show results than just a
6 month.

7 Q. After that initial month period, did you
8 think she was doing a good job?

9 A. I think she was trying. I mean I thought
10 she was doing -- I didn't really work with her that
11 much but I think she was doing a good job with what
12 she could do, yeah.

13 Q. Prior to that -- and we're going to
14 backtrack a little. Do you have any knowledge of
15 before that, before November of 2018 when Gregg's
16 access to the office changed? Do you have any
17 knowledge of Gregg and Lisa working together to
18 establish a 501(c)4 organization?

19 A. Prior to that, no. I only heard about the
20 50(c)4 until after Gregg was removed from the office.

21 Q. How did you learn about that, the 501(c)4?

22 A. Daniel I believe mentioned that that was
23 in the works, and then Gregg was going to go over and
24 head that 50(c)4 and leave the 50(c)3.

25 Q. When you learned about it after November

EXHIBIT 65

Letter from D. Pipes

March 13, 2019

Dear Gregg:

Effective March 9, your job description has changed so that you will more closely collaborate with, and give direction to, the Forum's communications and development teams.

Pursuant to our meeting on March 9, I formally offer you new terms for your employment during a probationary period from now until the end of 2019.

Title

You continue with the title of director.

Responsibilities

You will have the following responsibilities:

- Providing non-binding guidance and advice to the Forum's administrative staff, including myself and its communications and development teams.
- Managing the Forum's external projects and initiatives, including all the directors of the Forum's formal projects except the *Middle East Quarterly* staff.
- Fundraising, in meetings, on the telephone, and in writing.
- Making media appearances on Forum-related topics.
- Developing a new 501(c)(4) organization.

Restrictions

You will have the following restrictions until further written notice:

- No involvement in the Forum's accounting and finances.
- No authority over the Forum's controller.
- No authority to hire or fire Forum employees, including project directors, although your suggestions are welcome.
- No authority to approve expenses of projects or initiatives, although your suggestions are welcome.
- No authority to limit communications of staff – in particular the controller, director of communications and director of development – with me.
- No authority to offer or approve contracts on behalf of the Forum, although your suggestions are welcome.
- No authority over Middle East Forum Education Fund monies, although your suggestions are welcome. We hope this will change in 2020.
- Limited access to the Forum's Philadelphia office; you may access the office when I am present, when invited to a meeting, or otherwise when you give notice to all administrative staff.
- No contact with the Forum's female employees outside of business hours other than at Forum-sponsored events, or using Forum e-mail or Telegram. That means no after-hours telephone calls, texts, other e-mails, social media, drinks, meals, outings, trips, shared lodgings, and so forth. And during business hours, interactions will be business-related, within reason, and occur when you are in the office (as specified above), at Forum-sponsored events, or using Forum e-mail, phone (no texts), or Telegram.

Salary

Your salary and benefits remain unchanged. Your salary will be payable in accordance with the Forum's standard payroll practice and subject to applicable withholding taxes. Because your position is exempt from overtime pay, your salary will compensate you for all hours worked.

Expenses

You agree not to incur any liabilities with third parties and only to expend your own resources with the expectation of reimbursement by the Forum when specifically pre-approved by me in writing, on a case by case basis. If the expense is approved by me, you shall lay out the funds, then submit a reimbursement form to the Forum's controller.

Travel

You will continue to travel on MEF business, according to the procedures specified under Expenses, above. When traveling, you must keep in mind that you are working for a non-profit that legally and morally must spend money thriftily. That means economy class on trains and planes, standard business rooms in hotel, and ordinary rideshare and rental cars. In particular, when possible, air travel must be booked weeks in advance to get advantageous prices.

Other terms

You will be an employee-at-will, meaning that either you or the Forum may terminate our relationship at any time for any reason, with or without cause. Any statements to the contrary that may have been made to you, or that may be made to you, by the Forum, its agents, or representatives, are superseded by this offer letter. These terms are subject to change; any changes will be made in writing.

Aside from the limited office access described above, you shall work remotely, from anywhere of your choosing.

You are eligible to participate in the following benefit plans:

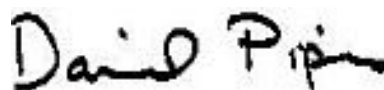
- Group medical health, which may include dental and vision coverage depending on the plan you choose.
- 403(b) retirement plan.
- Life insurance.
- Short-term and long-term disability.

(Please note: participation in these benefits may *reduce* the amount of your all-inclusive salary.)

If you wish to accept employment with the Forum under these terms, please indicate so by signing two copies of this letter, returning one copy to me. You may do so by regular mail or by scanning this letter and e-mailing it.

This offer and all terms of employment stated in this letter will expire at 5:00 PM Eastern Daylight Time on Monday, March 18, 2019.

Sincerely,

A handwritten signature in black ink that reads "Daniel Pipes". The signature is written in a cursive, slightly slanted style.

Daniel Pipes
President, Middle East Forum

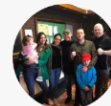
EXHIBIT 66

Message from D. Pipes to Plaintiff

< Chats

Lisa Barbounis

last seen recently



March 18

Tell me if I am wrong, but I am under the impression that Jack Posobiec is not someone MEF wants to associate with

3:16 PM ✓✓

I'm friendly with him. He's pro trump. I don't find his tweets too extreme.

3:17 PM

his reputation won't hurt us?

3:39 PM ✓✓

I don't think so. But how are we affiliated with him anyway? Am I missing something?

4:04 PM

RTing him

4:07 PM ✓✓

That was an accident that I immediately undid.

4:07 PM

I don't retweet like that from the MEF account. Only fellows and staff

4:07 PM

good. And do remember to add value to the retweet. Be interesting

4:08 PM ✓✓

Ok.

4:08 PM

that's our stock in trade

4:08 PM



Message



EXHIBIT 67

Email from M. Fink

From: Marc Fink <fink@meforum.org>
Sent: Wednesday, March 27, 2019 6:56 PM
To: Tricia McNulty
Cc: Daniel Pipes
Subject: Re: Meeting Summary and Moving Forward

Dear Tricia,

Thank you again for your input regarding the meeting we had with Gregg on March 9.

We took your comments into account when formulating a new structure for Gregg's use of the office.

He will have limited access to the office, accessing it only when: (i) Daniel is present; (ii) when invited to a meeting; or (iii) when he gives notice to all administrative staff.

He will not have a key.

Regards,

Marc

EXHIBIT 68
Message from
Plaintiff to
Roman

March on June 9

Lisa Barbounis <Barbounis@meforum.org>

Thu 5/31/2018 2:16 PM

To: Gregg Roman <Roman@meforum.org>

Cc: Marc Fink <fink@meforum.org>; Sam Westrop <Westrop@meforum.org>; Delaney Yonchek <Yonchek@meforum.org>; Raheem Kassam <raheemkassam@gmail.com>

There is another march for Tommy on June 9th at 3:00pm. Its hosted by Danny Tommo and there are 2.9k going and 13k interested. Should we try and make contact with the organizer, bus people in, and promote the event with FB ads?

We could also contact Vickie (see below) and offer to organize busses or just send them money to do it.

This was on the FB event:

"As discussed yesterday, people need to know who is going from different cities and big towns. And how they can get to London for the march on the 9th of June. [Vickie Selway](#) will try and help as many as possible, let her know where you are coming from she will do her best to help with times, meet points, bus & train routes to London on the day. add yourself to the group and lets get everyone there and home for the 9th of June..."

Sincerely,

Lisa Barbounis

Executive Liaison

[Middle East Forum](#)

O: 215.546.5406 x102

C: 215.910.2154

F: 215.546.5409



Please subscribe to our newsletters [here!](#)

EXHIBIT 69

Contract with D. Thomas



GRANT AGREEMENT

This Grant Agreement ("Agreement") is made and entered into as of June 4, 2018, by and among the Middle East Forum, a non-profit trust based in Philadelphia, PA ("Grantor"), and Daniel Thomas, a citizen of England ("Grantee") (collectively, "the Parties").

WHEREAS, Grantee is Mr Daniel Thomas and

WHEREAS, Grantor promotes American interests in the Middle East and protects Western values against Middle Eastern threats; and

WHEREAS, Grantor finds of its own free will that financial support of Grantee furthers its stated purposes.

NOW, THEREFORE, Grantor has agreed to provide a grant ("Grant") in the amount of U.S. \$32,000.00 to Grantee, *strictly subject to the following terms and conditions agreed upon by the Parties:*

Section 1. Purpose and Grant Period

- 1.1 Purpose. The Grant shall be used by the Grantee solely to fund a freedom of conscience event in Westminster Council, London, United Kingdom on June 8th [or to implement the proposal submitted by the Grantee and attached to this Agreement as Appendix A], except as limited under Section 5 of this Agreement ("Purpose").
- 1.2 No Change in Purpose. No material changes in the Purpose of the Grant, or the activities of Grantee subsidized by the Grant, shall be made without prior written permission of the Grantor.
- 1.3 Grant Period. The "Grant Period" shall commence on June 1, 2018 and continue in effect until May 31, 2019 [or until completion of the Purpose of this Grant, as defined in Section 1.1], or until terminated by Grantor under Section 6 of this Agreement.

Section 2. Payments

- 2.1 Payments. Grantor shall pay to Grantee U.S. \$32,000.00 upon execution of this Agreement.
- 2.2 No Future Obligation. Grantor is under no obligation to make any other payments to Grantee, or to provide Grantee with any other support.

Section 3. Acknowledgement of Support

- 3.1 General Activities. If Grantor so requests, Grantee shall ensure that all publicity releases, informational brochures, printed programs, publications and public reports related to the Purpose of this Grant, as defined in Section 1.1, acknowledge Grantor's support in a manner mutually agreed upon by the Parties.
- 3.2 Specific Activities. If Grantor so requests, Grantee shall ensure that all publications, films, audio and video recordings produced according to the Purpose of this Grant, as defined in Section 1.1, acknowledge Grantor's support in the following format: "This (publication/film/video/recording/activity) was made possible by a Grant from the Middle East Forum."

- 3.3 Disclaimer. If Grantor so requests, Grantee shall ensure that all publicity releases, informational brochures, printed programs, publications and public reports related to the Purpose of this Grant, as defined in Section 1.1, and/or all publications, films, audio and video recordings produced according to the Purpose of this Grant, as defined in Section 1.1, contain the following disclaimer: "The views expressed herein do not necessarily represent those of the Middle East Forum." If Grantee produces a public program related to the Purpose of this Grant, as defined in Section 1.1, such disclaimer shall be announced by Grantee if Grantor so requests.
- 3.4 Confidentiality. If Grantor so requests, Grantee shall keep this Grant and Grantor's support of Grantee strictly confidential, and not disclose this Grant and/or such support to any third party at any time.
- 3.5 Grantor's Use. Grantor retains the right, at its sole discretion, to publicize this Grant and its support of Grantee in its own publicity releases, informational brochures, printed programs, publications, and public and/or private reports. Grantee may request that Grantor not publicize this Grant and such support of Grantee; but Grantor retains the right, at its sole discretion, to publicize this Grant and such support of Grantee.

Section 4. Work Products and Intellectual Property

- 4.1 Work Product Definition. "Work Products" include, but are not limited to, articles, research, other documents and written materials (including electronic writings), data, spreadsheets, programs, plans and designs, that Grantee creates in relation to the Purpose of this Grant, as defined in Section 1.1, and during the Grant Period, as defined in Section 1.3., whether Grantee creates such Work Products independently or in conjunction with Grantor.
- 4.2 Ownership. Any tangible or intangible Work Product, including copyrights, created by the Grantee shall be, and remain, the property of Grantee.
- 4.3 Grant of License. Grantee grants Grantor a non-exclusive, irrevocable, perpetual, world-wide, no-charge and royalty-free license to use any Work Product under this Section 4, including, but not limited to, creating derivative works from Work Products under this Section 4, and/or reproducing and distributing Work Products under this Section 4 in all markets and media. This Grant of License survives in perpetuity, and regardless of whether or not this Grant Agreement is terminated, and/or regardless of whether or not the term of this Grant Agreement has ended, and/or regardless of whether or not the Parties end any other professional relationship.
- 4.4 Distributing Work Products. Grantor retains the right, at its sole discretion, to (1) circulate Grantee's Work Products, and/or summaries of Grantee's Work Products, to Grantor's email lists and subscribers; and (2) post Grantee's Work Products, and/or summaries of Grantee's Work Products, to its websites and/or social media accounts.

Section 5. Reporting

- 5.1 Upon Request. Upon Grantor's request, Grantee shall provide a written report on how the Grant has been used, and/or noteworthy achievements/impacts made using the Grant, within fifteen (15) days of the request.
- 5.2 Achievements. Grantee will notify Grantor of any noteworthy achievements made possible by the Grant, even in the absence of a reporting request as this will aid Grantor's future award decisions.

Section 6. Limitation on Use of Funds

- 6.1 Stated Purpose Only. The Grant shall be used only to further the Purpose stated in Section 1.1.
- 6.2 Consistent with Grantor's Tax-Exempt Status. The Grant shall be used in a manner consistent with Grantor's tax-exempt status. Grantee shall not use the Grant in any way that jeopardizes Grantor's tax-exempt status under section 501(c)(3) of the Internal Revenue Code of 1986 (U.S.), as amended (the "Code").

In particular, *Grantee shall not use any portion of the Grant to:*

- a. Carry on propaganda, or otherwise attempt to influence legislation within the meaning of the Code;
- b. Participate or intervene in any political campaign on behalf of, or in opposition to, any candidate for public office;
- c. Conduct, directly or indirectly, any voter registration drive;
- d. Engage in, induce, or encourage violations of law or public policy;
- e. Conduct or support any terrorist-related activities or any other conduct in violation of the U.S. Patriot Act;
- f. Cause any private inurement or improper private benefit to occur; or
- g. Take any other action inconsistent with Grantor's qualification under the Code.

Section 7. Termination; Return of Funds

- 7.1 Unused Funds. Grantee shall repay to Grantor any unused portion of the Grant; and/or any portion of the Grant not used for the purposes described in Section 1.1.
- 7.2 Violation of Agreement. Grantor retains the right to terminate this Grant Agreement and withhold, withdraw, or demand return of the entire Grant in the event that Grantee violates any term or obligation in this Agreement. Accordingly, Grantee shall return to Grantor all Grant funds it has received from Grantor if Grantee violates any term or obligation in this Agreement. Grantee will have five business days to return the funds to the Grantor. The Parties agree that Grantor, in its sole discretion, shall determine whether Grantee violates any term or obligation in this Agreement.
- 7.3 Objectionable Behavior. Grantor retains the right to terminate this Grant Agreement and withhold, withdraw, or demand return of the entire Grant in the event that Grantor, acting in good faith, finds Grantee's conduct objectionable and thus damaging to Grantor's reputation. Accordingly, Grantee shall return to Grantor all Grant funds it has received from Grantor if Grantor, acting in good faith, finds Grantee's conduct objectionable and thus damaging to Grantor's reputation. Grantee will have five business days to return the funds to the Grantor.
- 7.4 False Statements. Grantor retains the right to terminate this Grant Agreement and withhold, withdraw, or demand return of the entire Grant in the event that Grantor, acting in good faith, determines that any of Grantee's work related to the Purpose of this Grant, as defined in Section 1.1, contains false statements of fact. Accordingly, Grantee shall return to Grantor all Grant funds it has received from Grantor if Grantor, acting in good faith, determines that any of Grantee's work contains false statements of fact. Grantee will have five business days to return the funds to the Grantor.
- 7.5 Change in Financial Position. Grantor retains the right, at any time, to terminate this Grant Agreement and withhold any unpaid portion of the Grant if it determines, in its sole discretion, that sufficient funds are no longer available or that it has suffered a material adverse change in financial position.

Section 8. Research and Work Standards

- 8.1 Responsibility. Grantee is responsible for ensuring that all works related to the Purpose of this Grant, as defined in Section 1.1, in all possible forms and formats, including works commissioned by Grantee, be consistent with Grantor's own research standards. All works related to the Purpose of this Grant, as defined in Section 1.1, must have all statements and/or facts properly described and cited. Grantee must ensure the verifiability of all assertions of fact Grantee makes.
- 8.2 Burden to Defend. Grantee bears the sole responsibility for the accuracy of any statement of fact listed in all works related to the Purpose of this Grant, as defined in Section 1.1. Should a statement of fact contained within any of Grantee's work related to the Purpose of this Grant, as defined in Section 1.1, be accused of being false, misleading or not properly cited, the Grantee bears the burden to defend the work.

Section 9. Limitation of Liability

- 9.1 No Liability. The Grantor assumes no liability for any consequence, whether direct or indirect, arising out of this Grant, and/or arising out of any activities of Grantor, including, but not limited to: court costs; legal costs; and/or penalties and/or sanctions, whether civil or criminal.
- 9.2 No Agency. This Grant Agreement and the Grant shall in no way be construed as creating the relationship of principal and agent, of partnership in law, or of joint venture as between Grantor and Grantee.
- 9.3 Hold Harmless. Grantee indemnifies and holds harmless Grantor, its employees, agents, officers, and contractors with respect to all claims, demands, actions, charges, indictments, costs, expenses, losses, damages and all other liabilities arising from a) actions and/or omissions by Grantee in relation to this Grant; and b) Grantee's obligations to any third parties.

Section 10. No Legal Representation

- 10.1 No Legal Representation. Grantor assumes no responsibility for Grantee's legal representation and/or potential legal representation; and is not a party to any agreement Grantee has or might have with legal representation.
- 10.2 No Legal Advice. Grantor has not, and will not, provide Grantee with legal advice.

Section 11. Miscellaneous

- 11.1 Grantor's Discretion. Grantor makes this Grant at its sole discretion.
- 11.2 Failure to Execute. Grantor retains the right to rescind this Agreement should the Grantee fail to return to Grantor the Agreement fully executed within 14 days of Grantee's receipt. A sent email with this Agreement attached constitutes receipt under this Section 10.
- 11.3 Entire Agreement. This Agreement shall supersede any prior oral or written understandings or communications between the Parties and constitutes the entire agreement of the Parties with respect to the subject matter hereof. This Agreement may not be amended or modified, except in a writing signed by both Parties hereto.
- 11.4 Severability. If any provision of this Agreement is declared void, invalid, or illegal by any governmental, judicial or arbitral authority, the validity or legality of any of the other provisions and of the entire Agreement shall not be affected thereby and the remaining provisions shall remain in full force and effect.
- 11.5 Modifications. This Agreement cannot be terminated, amended or otherwise modified except in a writing signed by both Parties.

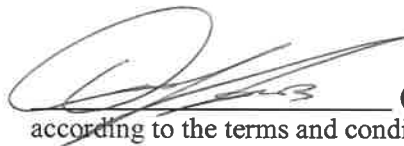
- 11.6 Disputes and Jurisdiction. Should a dispute arise over any aspect of this Agreement, the Parties will resolve the dispute through mandatory and binding arbitration administered exclusively by the American Arbitration Association.
- 11.7 Governing Law. This Agreement shall be governed by and construed in accordance with the laws of the Commonwealth of Pennsylvania (U.S.) applicable to agreements made.

In witness whereof, the Parties hereto have executed this Agreement as of the day and year first written above.

The Middle East Forum (Grantor) has agreed to provide this Grant:



By: Gregg Roman, Director



(Grantee), accepts this Grant according to the terms and conditions set forth in this Agreement:

Appendix A:

Good Afternoon Gregg,

Further to our conversation, please find below a break down what is required for the day. I have included the companies name and what it is they are providing.

ACE PA HIRE --

Costs for production as follows :-

PA system complete package £4000-00
Stage including steps and balustrade complete £1500-00
Vehicle hire and transport costs £950-00
6x. Staff £1400-00
Mobile Porta cabin including delivery. £1250-00
1x. Road tow posh loo system £700-00
1x. Mobile large HD video screen hire incl delivery. £3300-00
1x. Set crowd barriers (30 standard)(10 herress) £1200
1x. Road tow generator incl distribution system £450-00

Event Package total £14750-00+vat
Vat. £2950-00

TOTAL £17,700-00 incl vat

Bauer Security in London

Providing 20 highly experienced Security guards for the stage & its perimeter (ONLY)

£20 per hour per Guard, we will need them there for 6 hours.

£20 x 6 hours per Guard = £120

£120 x 20 Guards = £2400

Total cost **£2,400**

The reality Report will be providing & dealing with the following...

Freebie merchandise (T-Shirts & Wristbands) handed to crowd -- £500

Westminster council event and filming permission -- £700

Graphics, three authorised artists. -- £300

Food and drinks for the speakers for the event -- £100

Consultancy fees & project co-ordination -- £600

Comms for Security £150

Video editing £200

Total cost £2,350

Total cost for the full event is £22,450

If you have any questions please do come back to me, we are looking at getting these companies paid as soon as possible.

Look forward to hearing from you.

Daniel

EXHIBIT

70

Invoices

ACE P.A. HIRE
 6 TURCHILL DRIVE
 WALMLEY
 SUTTON COLDFIELD
 WEST MIDLANDS
 B76 1YQ
 Tel : 07973691930
 Email : info@acepahire.co.uk
 VAT Reg No: 864 - 9211 - 06

REBEL MEDIA
 8 WALNUT WALK
 SILSOE
 BEDFORD
 MK45 4GT

INVOICE

Page 1

Invoice No	1223
Invoice Date	09/06/2018
Order No	
Account Ref	RM2

Quantity	Description	Unit Price	Disc Amt	Net Amt	VAT %	VAT
1.00	SCREEN	3,000.00	0.00	3,000.00	20.00	600.00
1.00	TOILET FACILITIES	660.00	0.00	660.00	20.00	132.00
1.00	HOSPITALITY TRAILER	1,055.00	0.00	1,055.00	20.00	211.00
1.00	20k PA system complete	3,500.00	0.00	3,500.00	20.00	700.00
1.00	TRANSPORT	900.00	0.00	900.00	20.00	180.00
1.00	CREW AS REQUIRED	1,200.00	0.00	1,200.00	20.00	240.00
1.00	FENCING AS REQUIRED	1,000.00	0.00	1,000.00	20.00	200.00
1.00	GENERATOR	350.00	0.00	350.00	20.00	70.00
1.00	STAGE AS REQUIRED	1,000.00	0.00	1,000.00	20.00	200.00

Deliver To :
 SUNDAY 9TH JUNE 2018
 WHITEHALL
 LONDON

Total Discount	£	0.00
Total Net Amount	£	12,665.00
Carriage Net	£	0.00
Total VAT Amount	£	2,533.00
Invoice Total	£	15,198.00

BACS PAYMENTS ACC.No. 00944518 SORT 30-93-09
 MR P BAVIN T/A ACE PA HIRE

Fwd: Tommy Robinson

Gregg Roman <Roman@meforum.org>

Tue 6/12/2018 4:43 PM

To: Lisa Barbounis <Barbounis@meforum.org>

Gregg Roman

Begin forwarded message:

From: <danielthomas@tes-uk.co.uk>

Date: June 4, 2018 at 7:11:43 AM EDT

To: <Roman@meforum.org>

Subject: Tommy Robinson

Reply-To: <danielthomas@tes-uk.co.uk>

Good Afternoon Gregg,

Further to our conversation, please find below a break down what is required for the day. I have included the companies name and what it is they are providing.

ACE PA HIRE --

Costs for production as follows :-

PA system complete package £4000-00

Stage including steps and balustrade complete £1500-00

Vehicle hire and transport costs £950-00

6x. Staff £1400-00

Mobile Porta cabin including delivery. £1250-00

1x. Road tow posh loo system £700-00

1x. Mobile large HD video screen hire incl delivery. £3300-00

1x. Set crowd barriers (30 standard)(10 herress) £1200

1x. Road tow generator incl distribution system £450-00

Event Package total £14750-00+vat

Vat. £2950-00

TOTAL £17,700-00 incl vat

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£20 per hour per Guard, we will need them there for 6 hours.

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Westminster council event and filming permission -- £700

Graphics, three authorised artists. -- £300

Food and drinks for the speakers for the event -- £100

Consultancy fees & project co-ordination -- £600

Comms for Security £150

Video editing £200

Total cost £2,350

Total cost for the full event is £22,450

If you have any questions please do come back to me, we are looking at getting these companies paid as soon as possible.

Look forward to hearing from you.

Daniel

EXHIBIT 71
Messages from
Plaintiff re:
London

2018-06-03 18:10:25 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:10:25 -0400

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10:50p

EWR

7h 10m

11:00a +1

STN



5:55p

STN

8h 25m

9:20p

EWR

\$804

Primer Air Scandinavia



10:30p

EWR

6h 45m

10:15a +1

LHR



5:55p

STN

8h 25m

9:20p

EWR

\$877

Air India / Primer Air Scandinavia



9:35p

EWR

6h 55m

9:30a +1

LHR



10:50a

LHR

7h 50m

1:40p

EWR

\$2809

British Airways



9:35p

EWR

6h 55m

9:30a +1

LHR



FILTERS

2018-06-03 18:11:29 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:11:29 -0400

I don't know if I can bring myself to spend that for literally one day

2018-06-03 18:11:39 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:11:39 -0400

I know

2018-06-03 18:12:05 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:12:05 -0400

What if we throw another day in there

2018-06-03 18:13:51 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:13:51 -0400

Aaaah idk, it's a lot of money for not much time

2018-06-03 18:14:34 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:14:34 -0400

I know. It looks like Raheem is ducking out cause Gregg won't pay him. I won't get the connects if he isn't going

2018-06-03 18:15:30 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:15:30 -0400

Oh shit, he's not doing the rally at all, I thought that was on his own

2018-06-03 18:16:15 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:16:15 -0400

I don't know. I'm asking him now.

2018-06-03 18:21:47 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:21:47 -0400

Raheem just said he'd pay for you

2018-06-03 18:22:10 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:22:10 -0400

HAHHAA

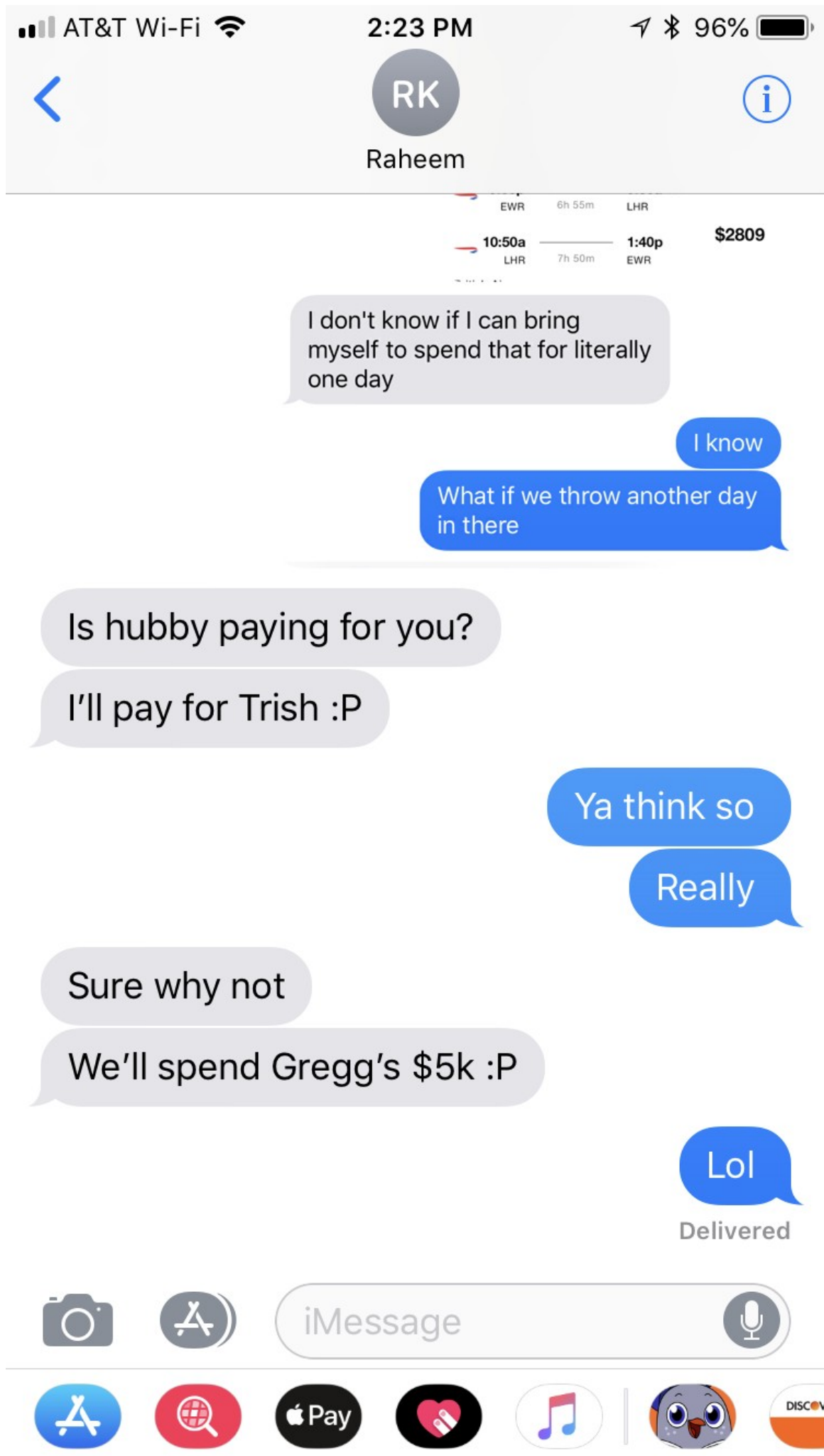
2018-06-03 18:22:22 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:22:22 -0400

Done and done

2018-06-03 18:24:04 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:24:04 -0400



2018-06-03 18:36:34 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:36:34 -0400

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10:15a +1

LHR

**12:30p**

LHR

7h 30m

3:00p

EWR

\$630

Air India

**12:40a**

EWR

14h 30m

8:10p

LGW

**8:50p**

LGW

31h 35m

11:25p +1

EWR

\$650

WOW air

**10:30p**

EWR

6



FILTERS

+1

\$820**Buy. Claim. Get \$ Back.**

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VIEW

2018-06-03 18:43:10 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:43:10 -0400

Showing you the times what are you think

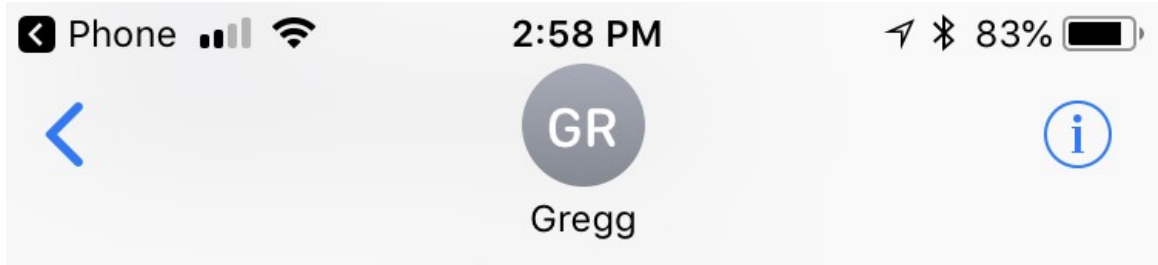
2018-06-03 18:44:55 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:44:55 -0400

He's definitely paying for your ticket

2018-06-03 18:58:16 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:58:16 -0400



Sent

Today 2:11 PM

Are you going to London for this.

I want to go.

Tricia and I sent you an email asking for Monday the 11th off. Can you approve so we can book our flights? Please?? 🙏

Hold on; might be better to not have MEF personnel there

Let me talk to the boss

How would you like to be Steve Brannon's crew?

We wouldn't be on stage this is pleasure

Delivered



iMessage



2018-06-03 18:59:00 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:59:00 -0400

What a DICK

2018-06-03 18:59:33 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 14:59:33 -0400

SHUT up. I knew he was gonna do something I just knew it

2018-06-03 19:19:03 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:19:03 -0400

I'll look for flights that come home on Sunday fuck it

2018-06-03 19:19:51 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:19:51 -0400

Uuugh, what a fucking dick, one fucking day, he has serious fucking issues

2018-06-03 19:23:38 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:23:38 -0400

He called me and talked about other stuff. Said he would talk to me tomorrow. I said I need to book the flights. He said Iâ€™ll talk to you tonight. You know DP could give 2 shifts

2018-06-03 19:24:51 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:24:51 -0400

Yeah, dp doesn't care what the fuck you and I do on our own time.. why wouldn't he just say one way or another on the phone

2018-06-03 19:27:28 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:27:28 -0400

I want to write this

2018-06-03 19:27:31 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:27:31 -0400

Is it that you don't want us at the march or off on Monday? If it's about the day I'll look for flights that come home on Sunday. If it's about what we do on our own time then we should talk about that

2018-06-03 19:29:26 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:29:26 -0400

Why does he just want to be difficult with everything?!?! _____

2018-06-03 19:36:14 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:36:14 -0400

I'm quitting they are all nuts

2018-06-03 19:53:22 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:53:22 -0400

Did he say anything else

2018-06-03 19:53:57 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:53:57 -0400

No but I just got into a minor tiff with Marnie.

2018-06-03 19:54:47 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:54:47 -0400

She wasn't understanding what I was asking because she didn't hear me out. She was like I don't want to be in the middle of you and Gregg and I feel like you are fucking with me.

2018-06-03 19:54:56 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:54:56 -0400

I need to leave this job. I hate them all

2018-06-03 19:55:21 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:55:21 -0400

Gregg is an abusive liar and Marnie is his lap dog

2018-06-03 19:55:31 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:55:31 -0400

__feel like you're fucking with me?? Why would she even say that.. she's like ready for a right

2018-06-03 19:56:14 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:56:14 -0400

Ya. I was just asking if he doesn't approve the time off on Monday am I allowed to do what I want on my own time?

2018-06-03 19:57:03 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:57:03 -0400

She was like if you want to get technical about the manual you didn't request time off in enough advance

2018-06-03 19:57:17 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:57:17 -0400

That sentence didn't make sense but you know what I mean

2018-06-03 19:58:16 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 15:58:16 -0400

Oh yeah, she's a hundred percent just ready to fight

2018-06-03 20:00:37 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 16:00:37 -0400

They are joy killers

2018-06-03 20:00:50 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 16:00:50 -0400

Joy killers totally

2018-06-04 00:11:18 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 20:11:18 -0400

So is it definitely not happening now

2018-06-04 00:13:20 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 20:13:20 -0400

No. Still waiting for Gregg to give me a yes or no.

2018-06-04 00:13:51 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 20:13:51 -0400

He could ruin a picnic

2018-06-04 00:13:57 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <"+1 609-742-1968">
To: Home <"+1 215-910-2154">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 20:13:57 -0400

—

2018-06-04 00:46:03 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 20:46:03 -0400

It's interesting that Lara (Greggs assistant) was there for 7 months and I'm at my breaking point at 7 months

2018-06-04 00:47:28 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 20:47:28 -0400

I'm suuuuuure there's a trend

2018-06-04 00:47:54 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Sun, 03 Jun 2018 20:47:54 -0400

And they're probably making up rumors about you and I "plotting" as we speak

2018-06-04 12:10:38 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 08:10:38 -0400

We are going!!!

**2018-06-04 12:16:03 UTC: +1 609-742-1968 -> [+1 215-910-2154,
lisarey@sas.upenn.edu]**

From: Tricia McNulty <"+1 609-742-1968">
To: Home <"+1 215-910-2154">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 08:16:03 -0400

Hdugsugusvsjvjdvkbdjsvdmfkbsk

2018-06-04 12:16:25 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 08:16:25 -0400

Holy shitttttt

2018-06-04 13:06:11 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 09:06:11 -0400

We can book the flights today

2018-06-04 13:06:38 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 09:06:38 -0400

Are we going til Sunday or Monday

2018-06-04 13:06:40 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 09:06:40 -0400

I got you a moca

2018-06-04 13:06:44 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 09:06:44 -0400

Monday

2018-06-04 13:06:57 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 09:06:57 -0400

I'm wfh __

2018-06-04 13:07:07 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 09:07:07 -0400

Ughhhhhhhh

2018-06-04 13:07:10 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 09:07:10 -0400

Fine

2018-06-04 13:07:17 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 09:07:17 -0400

I'll put it in the fridge

2018-06-04 13:07:18 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 09:07:18 -0400

Hahah shiza

**2018-06-04 13:07:22 UTC: +1 609-742-1968 -> [+1 215-910-2154,
lisarey@sas.upenn.edu]**

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu >
Date: Mon, 04 Jun 2018 09:07:22 -0400

Yesssss

2018-06-04 13:07:34 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu >
Date: Mon, 04 Jun 2018 09:07:34 -0400

Ohmygosh I'm so exciiiiitec

2018-06-04 16:34:50 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 12:34:50 -0400

I need your birthdate

2018-06-04 16:35:03 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 12:35:03 -0400

And your name and passport number if you have it.

2018-06-04 16:52:26 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 12:52:26 -0400

We are booked. Cheapoair!

2018-06-04 16:52:32 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 12:52:32 -0400

—

2018-06-04 16:55:45 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 12:55:45 -0400

Hahahahah gaaaaaaaaaah I cant believe this!! I'm so excited!!!!

2018-06-04 16:55:59 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 12:55:59 -0400

I make shit happen

2018-06-04 16:56:02 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 12:56:02 -0400

Lol

2018-06-04 16:56:18 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 12:56:18 -0400

We don't have a place to stay yet.

2018-06-04 16:56:28 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 12:56:28 -0400

Working on it

2018-06-04 17:05:45 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 13:05:45 -0400

Making major shit happen.. who books a trip on a Monday to fly to London for the weekend?!

2018-06-04 17:07:19 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 13:07:19 -0400

We do!!

2018-06-04 17:07:29 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 13:07:29 -0400

Our tickets were 650 a piece

2018-06-04 17:07:42 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 13:07:42 -0400

We have to get to Newark

2018-06-04 17:07:51 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 13:07:51 -0400

I'll drive and park

2018-06-04 17:13:42 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 13:13:42 -0400

Are you bringing a suitcase?

2018-06-04 17:13:55 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 13:13:55 -0400

Um yessss

2018-06-04 17:13:59 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 13:13:59 -0400

Lol

2018-06-04 17:14:09 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 13:14:09 -0400

You know me. I need ALLL MY shit

2018-06-04 17:15:11 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 13:15:11 -0400

Hahhahahah ok ok perfect

2018-06-04 17:18:43 UTC: +12159102154@iMessage -> [3 recipients]

From: Home <+12159102154@imessage>
To: Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>
Date: Mon, 04 Jun 2018 13:18:43 -0400

Raheem is booking the room. I told him to save money you and I could share a room but 3 is better

2018-06-04 17:25:48 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968" >
To: Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu >
Date: Mon, 04 Jun 2018 13:25:48 -0400

Kk

EXHIBIT 72
Photo of Plaintiff
and P. McNulty
in London.



 **Lisa Reynolds**
28 September · 🌐

  19

 Share

EXHIBIT 73

Email from

Plaintiff to

Roman

From: Lisa Barbounis
Sent: Friday, June 22, 2018 12:59 PM EDT
To: Raheem Kassam (Breitbart London) <raheemkassam@gmail.com>; Gregg Roman <Roman@meforum.org>
Subject: RE: 14th July Budget
Attachment(s): "2018-07-14 TR Event Budget Proposal.png"

Gregg,

I couldn't get it to open on my desktop, only on my phone. I took a screen shot for you if you are having the same issue.

Here is my opinion. I have a bad taste in my mouth from the last event. Danny applied for the grant but hasn't supplied, to my standards, a proper account of the money disbursements and I now have 2 "vendors" asking for money (reality report and the camera people who were directly hired by Kevin, only referred to by us/Raheem because he asked for a name).

If the donor is interested in funding another event then I think Raheem should apply for the grant, receive the money and dispense it properly with receipts. I don't seem to trust anyone else and I certainly don't trust their people and there is no organization between groups talking about helping Tommy.

If the donor doesn't want to participate, or if he does and we let others handle it, we really need to consider the Congressman's involvement. That is our reputation on the line and he needs a schedule of meetings and a decent event.

This needs to be done properly. Names of vendors, addresses, written estimates, etc.

Let me know how you wish to proceed.

Sincerely,

Lisa Barbounis
Executive Liaison
[Middle East Forum](#)
O: 215.546.5406 x102
C: 215.910.2154
F: 215.546.5409



Please subscribe to our newsletters [here!](#)

From: Raheem Kassam (Breitbart London) <raheemkassam@gmail.com>
Sent: Friday, June 22, 2018 11:48 AM
To: Lisa Barbounis <Barbounis@meforum.org>; Gregg Roman <Roman@meforum.org>
Subject: Fwd: 14th July Budget

This is what Caolan and George have put together as an "all singing all dancing" budget for the day. I think some things can be cut out. For instance I don't think you are even allowed to have a sky writer above Westminster. Also things like hospitality and the mileage on the trucks etc are too much and can be cut if you need to. I would also want \$5k myself for time and arrangements like last time.

Sent from my iPad

Begin forwarded message:

From: George Llewelyn-John <george@llewelynjohn.com>
Date: June 22, 2018 at 11:16:15 AM EDT
To: "raheemkassam@gmail.com" <raheemkassam@gmail.com>
Subject: 14th July Budget

Hi Raheem,

Please find budget attached - some figures based on estimates with the organisations we'll use. i.e. final security costs are pending details of the speakers but I'm guessing we'll be going high on that one.

If your backers balk at the amount (I know this goes over \$30,000) I can look into getting a top up from Tommy or elsewhere if it comes to it - it will be worth it to make this a seminal event for this movement but also for European populism in relation to the UK.

Any questions/issues call me or feel free to pass my number along if need be.

Thanks,
George

+44(0) 7981 815 366

EXHIBIT 74
Invoice from D.
Thomas

FW: Invoices and expenses, for the March for Tommy on the 9th of June 2018.

Gregg Roman <Roman@meforum.org>

Wed 6/20/2018 7:04 PM

To: Lisa Barbounis <Barbounis@meforum.org>

 1 attachments (1,016 KB)

Screenshot_2018-06-11-13-22-56.png;

Gregg Roman
Director
Middle East Forum
www.meforum.org
P: 215-546-5406
Twitter: @greggroman

From: danielthomas@tes-uk.co.uk <danielthomas@tes-uk.co.uk>

Sent: Monday, June 11, 2018 9:11 AM

To: Gregg Roman <Roman@meforum.org>

Subject: Invoices and expenses, for the March for Tommy on the 9th of June 2018.

Morning Gregg,

Further to our conversation, please find below the invoices & expenses regarding the event on Saturday.

The amount that was available in my bank was £23,454

Ace Pa Hire

Mon 04/06, 10:13

You

Hi Daniel

Below is our invoice for the production for the event on the 9th of June, bank details are below the invoice.

PA system complete package £4000-00

Stage including steps and balustrade complete £1500-00

Vehicle hire and transport costs £950-00

6x. Staff £1400-00

Mobile Porta cabin including delivery. £1250-00

1x. Road tow posh loo system £700-00

1x. Mobile large HD video screen hire incl delivery. £3300-00

1x. Set crowd barriers (30 standard)(10 herress) £1200

1x. Road tow generator incl distribution system £450-00

Event Package total £14750-00+vat
Vat. £2950-00

TOTAL £17,700-00 incl vat

Bank details :-
Lloyds Bank PLC
Paul Bavin T/A Ace pa hire
Sort code 30-93-09
Acc number 00944518
Regards

Paul Bavin
Ace pa hire

Liam Tuff who runs Bauer Security, has asked me to send the £2400 to a personnel account so we do not have to pay the VAT.

I have attached a picture to prove this, please see attached.

The invoice for the Security is £2400

£900 sent to Jan Moudrak who Lisa knows and has asked me to pay, this money was to pay for Banner printing & Designers who worked hard on leaflets, banners and social media coverage etc.

His account number is:

50183393
20-92-60

Vicky Selway who organised the bus/train/cars to the event will be paid £200 in expenses (As directed by Lisa)

Outstanding amount after everyone is paid is £2,254

Expense for the event

£500 on expenses for travel for various staff (Taxis, trains, buses, Van hire)
£300 on expenses for food & drink (at and after the event)

£130 on a hotel for the night before, so I was in London on the morning of the event

£120 on expenses for my travel to London & home again

Total on expenses are £1050

And finally the outstanding amount of £1204

I had to liaise with the following for this event to go ahead

1. London city police, Met police
2. Westminster council
3. Geert wilders various teams from his press office to his security team,
4. Raheem, Gregg, Lisa.
5. London events team
6. Tommys family, friends, media team etc.
7. All speakers from Liam Tuff, Ann Marie Waters, Shazia Hobbs etc etc

As many of you are aware i did not sleep properly for days, had a lot of stress anyway with my daughters heart operation coming up etc

Since i started this, i have not done any work for my own business what so ever and have lost out financially which is now becoming an issue.

I feel for the efforts i have put in to making this event as successful as possible i will be invoice for the organisation and management of event for the amount of £1204.

Total once everyone is paid is

ACE PA -- £17,700

Bauer Security -- £2400

Jan Moudrak -- £900

Vicky Selway -- £200

Expenses -- £1050

Myself for the management of the event -- £1204

Total for event on the 9th of June -- £23,454

From everyone that was involved in this event, we would like to thank you for making this happen.

I am now taking a step back, and wont be dealing with any further events.

Again its been a pleasure to work with you guys, I wish you and your organisation the best of luck for the future.

Many Thanks

Danny Tommo

On 04 June 2018 at 15:45 Gregg Roman <Roman@meforum.org> wrote:

His sort code is: 09-01-29

Gregg Roman

Director

Middle East Forum

www.meforum.org

P: 215-546-5406

Twitter: @greggroman

From: Marnie Meyer
Sent: Monday, June 04, 2018 10:44 AM
To: danielthomas@tes-uk.co.uk
Cc: Gregg Roman <Roman@meforum.org>
Subject: RE: 2018 MEFEF Grant Agreement-Daniel Thomas

Dear Mr. Thomas,

I am in receipt of your signed contract. I am attempting to process the wire but the platform is asking for a "US Domestic Sort Code" do you have that number available? I'm afraid to miss any information that might delay the wire.

Thanks,

Marnie Meyer

Director of Finance & Operations

From: danielthomas@tes-uk.co.uk <danielthomas@tes-uk.co.uk>
Sent: Monday, June 4, 2018 10:26 AM
To: Marnie Meyer <meyer@meforum.org>
Cc: Gregg Roman <Roman@meforum.org>
Subject: Re: 2018 MEFEF Grant Agreement-Daniel Thomas

Please find attached the contract.

On 04 June 2018 at 14:24 Marnie Meyer <meyer@meforum.org> wrote:

Dear Mr. Thomas,

The Middle East Forum (MEF) is pleased to provide a total grant of \$32,000.00 in 2018 to you from its Education Fund.

US law requires charities to take steps to ensure any distributed funds are used exclusively in furtherance of their tax-exempt purpose and in accordance with US law.

Accordingly, we ask you to sign and return the enclosed grant agreement and a copy of your original request for funding by regular mail, fax or scanned attachment to an e-mail.

Please also provide payment and grantee contact information by filling out this [FORM](#).

Once we receive your signed grant agreement, we will send you the funds upon execution of the attached grant agreement.

If you have any questions or concerns, please do not hesitate to contact me.

Marnie Meyer

Director of Finance & Operations

Middle East Forum

Tel: (215) 546-5406

Fax: (215) 546-5409

www.MEForum.org

EXHIBIT 75
Message from
Plaintiff to V.
Barbounis

-19 20:38:41 UTC: +12159102154@iMessage -> [3 recipie

me <+12159102154@imessage>

me <" +1 215-910-2154">, Vasili Barbounis <" +1 215-439-1002">, Home <lisarey@sas.upenn.edu>, 19 Jun 2018 16:38:41 -0400

.ondon to the guy he is firing as a parting gift I'm so mad

EXHIBIT 76

Memo from

Plaintiff to

Roman

Memorandum

To: Gregg
From: Lisa
Date: August 3, 2018
Re: Tommy Robinson (TR) Proposals

Fundraising

1. To reach existing donors:
 - a. Report on TR
 - i. What happened
 - ii. How MEF contributed
 - iii. The result
 - iv. Why it is important to continue working on this issue à the fight does not stop with Tommy's release
 - b. Research new donors who have supported similar issues and solicit them with the TR report and proposal
2. To encourage new readers and donors
 - a. Facebook/Twitter post with link to or clip of Tommy's Fox interview
 - i. Gregg suggested the tagline: "MEF's work impacts lives. Support us to help support others' secure liberty."
 - ii. Highlight the Legal Project and other cases MEF has supported
 - iii. Donate button
 - b. Subscribers and those that emailed the info email to thank us for supporting TR
 - i. Should get a thank you return email with the option to donate
 - ii. The emails that came in through info should get a letter asking for support and information on how to receive our mailings.

Events

Purpose: To further the mission of MEF educating members of Congress and the general public of the dangers of Islamist influence while also raising awareness about the need for honest conversations about the subject.

1. Interview TR on MEF Radio
 - a. Hour long interview on Aug. 15 or later
2. Online Skype video with Gregg and TR
 - a. Double screen Skype recording to be published on MEFO, Facebook etc.
3. Tommy Robinson US trip
 - a. TR Congressional tour on Islamist influence and freedom of speech
 1. Meet Congressman on Capitol Hill to raise awareness the dangers of Islamist influence on western culture
 2. Film TR walking through the halls shaking hands with Members

3. We can use the footage for online presence
 4. The mainstream media here and abroad would cover his trip
 - b. Host a panel on Islamist threats and allowing unrestricted freedom of speech, freedom of the press, and the importance of honest conversations regarding Islamists
 - i. On the panel:
 1. TR
 2. DP
 3. Possible Reformist Muslim or Anti-Islamist Speakers
 - a. Hillel Fradkin (Hudson Institute)
 - b. Tarek Fatah (MEF Fellow)
 - c. Salim Mansur (Canadian anti-Islamist)
 - d. Salman Sima (Iranian anti-islamist activist in Canada - has tweeted support for Tommy)
 - e. Raheel Raza (Canadian Muslim activist - has tweeted support for Tommy)
 - f. Mohammad Al Hussein (UK based - Westminster Institute, anti-islamst Sheikh. He has served as defence witness in UK courts for persons convicted of insulting Islam)
 - g. Douglas Murray (Henry Jackson Society)
 - h. Baroness Cox
 - i. Dave Rubin (! - long shot, but he's interviewed Tommy before and this is exactly the sort of subject he's interested in)
 - j. Frank Gaffney
 - ii. Donors over 250 could attend and anyone else could donate to attend.
 - iii. Donations go to the fight to protect those who bring these issues to the forefront of mainstream media and politics (Legal Project)
 - c. Host a dinner in DC and NYC with TR and interested Congressman/Donors
 - i. Pay for attendance
 4. TR Europe Tour (not as effective for media)
 - a. London
 - b. Paris
 - c. Poland
 - d. Italy
 - e. D.C.
 - f. New York
 - i. Benefits: attractive to the younger generation
 - ii. Cons: Bad press, alt-right label

Timing

1. Taking advantage of the momentum With the intention to strike while the iron is hot I have some recommendations for fundraising and to keep MEF in the mainstream media.

Tommy Robinson's presence is large at the moment. Since our involve in the rallies for Robinson we have increased our social media and online presence by _____

Pros

Cons

EXHIBIT 77

Message from D. Pipes to Plaintiff

From: Daniel Pipes <Pipes@MEForum.org> on behalf of Daniel Pipes <pipes@meforum.org>

Sent: Tuesday, August 07, 2018 12:34 AM EDT

To: Gregg Roman <Roman@meforum.org>

Subject: Re: Possible future Tommy Robinson and MEF involvement scenarios

On 2018-08-06, 11:39 PM, "Gregg Roman" <Roman@meforum.org> wrote:

Here's an interesting memo from Lisa on how we might do follow up.

The key fact here is the increase in MEF's presence online, though 450 times seems unbelievable to me. If it is remotely that much, it does suggest we should continue with this topic. But verify that before we go on.

I am leery of associating too much with Tommy Robinson; he is Trouble with a capital T. Ask Ezra. Despite my personal endorsements of him (I don't remember him saying anything objectionable in our many hours together), MEF is better off treating him as a Legal Project beneficiary, i.e., keeping a distance.

Bringing him to the United States is not just logistically infeasible but too close for comfort.

So, let's take advantage of fundraising and social media opportunities but be cautious about more.

EXHIBIT 78

Facebook Post by Plaintiff

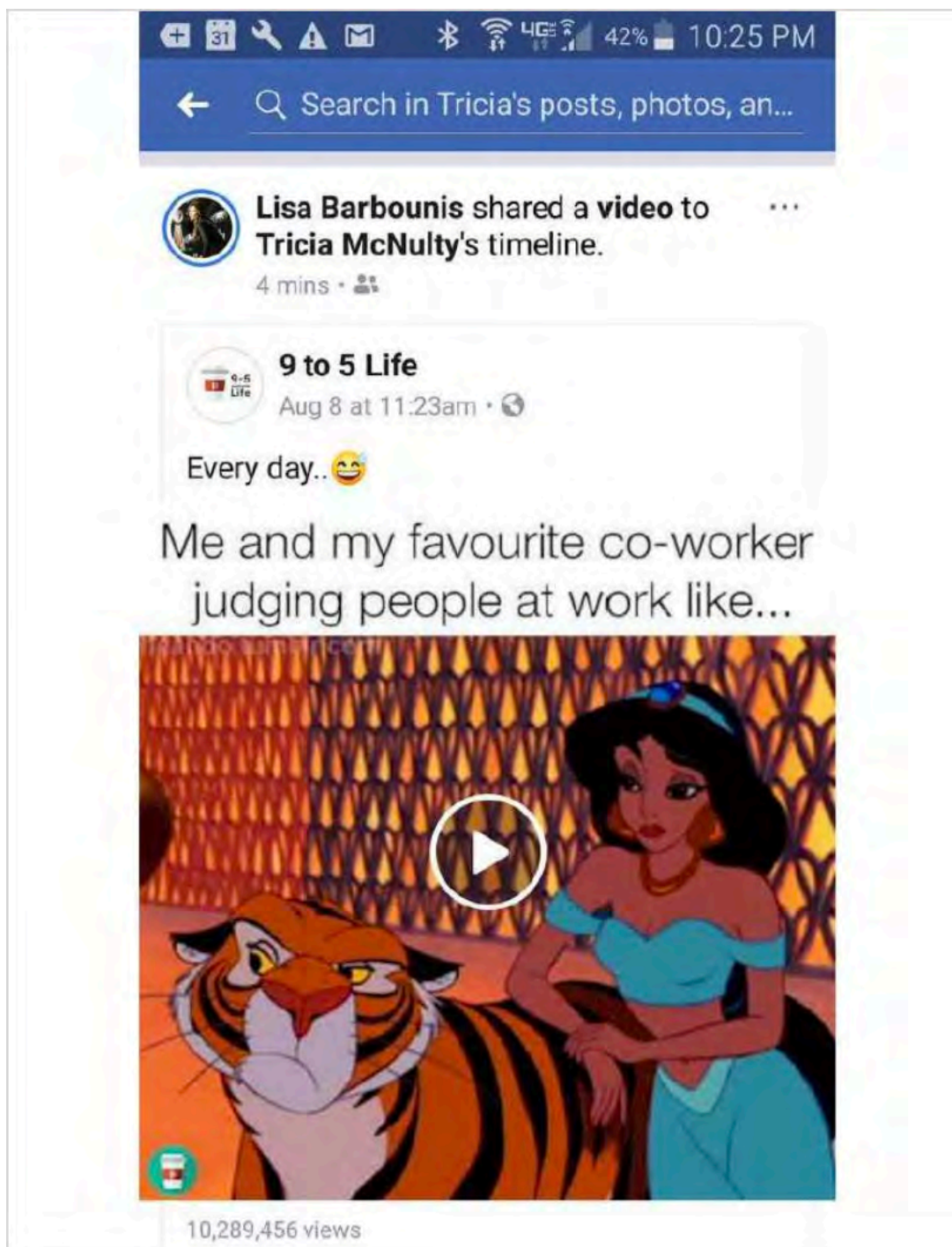


EXHIBIT 79
Message from
Plaintiff to
Roman

From: Lisa Barbounis
Sent: Tuesday, October 09, 2018 3:54 PM EDT
To: Gregg Roman <Roman@meforum.org>
Subject: FW: London 23rd October 2018

Breakdown of TR Demo Costs.

From: Tommy Robinson <tommy2711robinson@icloud.com>
Sent: Tuesday, October 9, 2018 10:47 AM
To: Lisa Barbounis <Barbounis@meforum.org>
Subject: Fwd: London 23rd October 2018

Sent from my iPhone

Begin forwarded message:

From: Dan Thomas <daniel.thomas123@outlook.com>
Date: 8 October 2018 at 11:15:41 BST
To: "tommy2711robinson@icloud.com" <tommy2711robinson@icloud.com>
Subject: London 23rd October 2018

From: Ace Pa Hire <info@acepahire.co.uk>
Sent: 07 October 2018 18:07:47
To: daniel.thomas123@outlook.com
Subject: London 23rd October 2018

Hi Danny

Ref. Old Bailey London 23rd October 2018

I have listed enough production to make a 12ft x 8ft stage with 6 speakers on stands around the stage area , 2 gazebos behind the stage with some fence around the gazebos / genie and stage steps. (NO front security fence or canopy for the stage)

Production as follows :-

Stage.

1x. 12ft x 8ft Prolite Stage 3ft High. £150

3x. 8ft balustrades £60

1x. Set modular steps £50

Sound.

1x. 3kw vocal PA system £300

1x. Sennheiser hand held radio mic with stand £55

1x. Media player and iPod cable £20

1x. Set Audio cables

Power.

1x. 30kva diesel road tow generator £350

1x. 30amp power distribution box £60

1x. Set mains cables £30

Back stage.

2x. 3mtr Sq Black gazebos with sides £100

8x. Basic folding chairs £00

Fence.

9x. Standard steel crowd barriers £90

Transport.

1x. Mercedes 4.6t sprinter with Tow bar. £100

1x. Tank of diesel fuel £90

Staff.

1x. Audio technician £250

2x. Road crew £400

London charges.

1x. LEZ charge. £200

1x. Congestion charge. £11.50

Estimated total. £2316.50+vat

Take a look over the list and tell me is this what you are thinking.

It's quite a small rig compared to last time and it's what we can do with one vehicle to keep the costs down. All prices plus vat.

Note.

Personally I think you will need a lot more security fence and sound because of Tommy's popularity but that will take more vehicles and staff. I have quoted for the extra production below. Let me know !

Additional security barrier and fencing.

1x. Flat bed 3.5t with 40 Heras with bases and a driver £1000.

1x. Flat bed 3.5t with 40 Crowd barriers and a driver £1000.

Additional sound .

1x. Extra 3kw sound system in the 4.6t sprinter with the tow-bar. £300

(taking out the crowd barrier because it's on the 3.5t flatbed)

Hope this all makes sense.

Regards

Paul Bavin
Ace pa hire
07973691930

Sent from my iPad

EXHIBIT 80
Message from
O'Brien to
Plaintiff

IBAN Number is

GB40 LOYD 3093 0900 9445 18

Regards

Donna

ACE PA HIRE



EXHIBIT 81
Transcript of
Call with D.
Thomas

Daniel Thomas (00:00):

Involvement with us.

Gregg (00:01):

Not just Lisa's involvement with you. What, what, what we have going on right now is an action which has been a year and a half in the making, and we're largely clueless as to what the United Kingdom angle is-

Daniel Thomas (00:13):

Okay.

Gregg (00:14):

... because we have one story that we're being told by some people, which just doesn't jive with some of the other things that we've seen on social media, that we've seen in the press. And we really just want to know, like, what the extent of her, you know... i- i- in general-

Daniel Thomas (00:29):

[crosstalk 00:00:29].

Gregg (00:29):

... what you may know, you know?

Daniel Thomas (00:31):

Okay. So Lisa, obviously, we, prior to when Lisa first came over, I was contacted by Lisa and made aware that there was, uh, some money going to be put available for the demonstrations, um, for the Free Tommy Robinson event in, uh, in Central London. Um, and we spoke m- many times, um, about the money, uh, about what it was for. We went through that. And obviously, then, um, it was issued to us. We paid, paid the people that it was, it was, uh, for.

Daniel Thomas (00:58):

And, uh, and on the day that the event actually happened, um, Lisa came over, uh, with a friend. She, um, she was on the, on the stage. Uh, she thinks she stayed for about a week. And then, um, she, her involvement was largely, really, on the basis of, um, she started becoming sort of a PA for Tommy and trying to get him into the US, trying to, um, uh, speak to congressmen to get him, uh, get a visa for, for him to come over. Um, there was also, I think, money was, uh, given for, for, for court cases, uh, that Tom had.

Daniel Thomas (01:35):

Um, Lisa came over a few times. Um, I, I did start a, a type of relationship with Lisa, uh, after the second time she came over. Um, she-

Gregg (01:49):

When, when-

Daniel Thomas (01:49):

... Yeah.

Gregg (01:49):

... when was that?

Daniel Thomas (01:50):

Uh, I would say, um, uh, uh, probably the second time, so that would have been, uh, the following month, so June j- I think July, I think, may, I think it was July. It's going back a while, so I'd have to, I'd have to really think about it. But, um, yeah.

Daniel Thomas (02:05):

She sh- we, we, she was coming over. We were s- we were going, uh, staying at hotels. We, um, she, she was telling me that she wasn't r- very happy in her job. She was looking at moving over to the, to, to, to, to the UK. She didn't want to be with her husband. Um, [inaudible 00:02:21] all these things, and-

Gregg (02:22):

Did she pay for those hotels?

Daniel Thomas (02:24):

... Yeah. Yeah. She did. Yeah. Uh, she then invited me to go to Brussels. Um, we had a, um, a meeting with the, um, leader of, uh, of UKIP, which is Gerard, well, the ex-leader of UKIP, Gerard Batten. Uh, politician, uh, Anne Marie Waters, uh, who is the leader of the For Britain, uh, political party [inaudible 00:02:43]. And also, um, who else was there? Uh, uh, um, what's her name? Uh, very controversial woman. Um, can't remember her name. Uh, it'll come back to me.

Daniel Thomas (02:55):

And we, she was inviting me to a conference there, because they were having a conference in Brussels to [inaudible 00:03:00] with all sorts of coming together and helping each other out. Uh, it was a swanky hotel. It was a five star hotel, um, all paid for b- by Lisa.

Daniel Thomas (03:09):

Uh, th- then things started getting a bit weird. Uh, Lisa started putting it, like, making, trying to t- blackmail be into basically being with her, because I, I became very skeptical about who she was and how she was behaving. Uh, and it sort of, like, worried me. And I wanted to, to end it. And, and she basically told me that if I did, that she would send every conversation that we'd ever had to, to my, uh, my, my girlfriend.

Daniel Thomas (03:36):

Um, she also mentioned, um, I'm going to put this out there, Gregg, uh, she did mention something to me. She said that she had a plan to get money out of, out of the, uh, Middle Eastern Forum. Um, and sh- there, she said that, uh, she was going to say that you had, you had come onto her and that you, um, you attempted to, uh, to force her into doing stuff with her and, and that she was going to take it, and she was going to make a lot of money from it, and she wanted me to be part of that. She wanted to leave her husband. She wants to come to the United Kingdom.

Daniel Thomas (04:11):

And I spoke to Tom about it, and I, and, and he said that she's, he felt the same, that there was something about her that wasn't right. Um, and I, I did, I ended up telling her that w- that I wanted to finish it. I didn't want to s- speak to her anymore.

Daniel Thomas (04:25):

Um, obviously, her involvement was largely still with Tommy. She was acting as a PA for Tommy in, in all sorts of senses. Uh, anything that Tommy wanted, she would, she would do.

Daniel Thomas (04:33):

Um, to then, to a point where she was sort of just turning up in the United Kingdom unannounced. We didn't know she was coming, and she'd just turn up, and, um, again, threatening me that if I didn't continue the relationship that she would tell my girlfriend.

Daniel Thomas (04:51):

And, uh, and, uh, yeah. So she came over a few times [inaudible 00:04:54] conversations, and then got to a point where I, um, I just said, "Look. That's it. That's it." And, uh, she then took it upon herself to basically destroy my life.

Daniel Thomas (05:04):

Uh, she sent everything to, um, to, to my girlfriend, uh, all, all messages, um, pictures of us in hotels, uh, all sorts of stuff, and became extremely, um, vicious, uh, in the way she did it. She enjoyed it. She, she [inaudible 00:05:21].

Daniel Thomas (05:22):

So, obviously, I, I got in touch with Lisa and I asked her what she, why she was doing it, and she was saying, "Look, you don't understand what you're missing out on. I'm about to get this money." Y- You know. And I just had to drop her out.

Daniel Thomas (05:32):

Um, yeah. I mean, I can go into [inaudible 00:05:35] about more w- but I don't know what you w- how else you want me to talk about. But that's, that's sort of the short version of it.

Gregg (05:42):

Well, that's, that's-

Daniel Thomas (05:42):

Really.

Gregg (05:43):

... [crosstalk 00:05:43] that's, that's, uh, (laughs) that's quite a story. Uh, I mean, I guess-

Daniel Thomas (05:46):

Yeah.

Gregg (05:48):

... as a, as an individual, I'm personally interested, did she ever write to you about saying she was going to make a lot of money? Did she ever convey it in a way that-

Daniel Thomas (05:57):

She would. Yeah. Yeah. She did. But, yeah. She did. But I mean, we, we spoke on Facebook ma- majority of the time. But obviously, I was, uh, I was censored. I lost everything. So, um, I have n- I have nothing. Um, Facebook took me down. Twitter took me down. Obviously, along with Tommy.

Daniel Thomas (06:11):

Uh, it was a, it, it was her long term plan. I mean, when we started n- the real sort of, like, being, being together, sort, if you want to call it that, that was what she was, was looking to do. She said she was about to get loads of money. She wanted to buy a house over here. She wanted me to move in with her and, and everything else. Um, and she spoke, she spoke about that quite often, really, because that was her, her long term plan.

Gregg (06:35):

Did she speak about it with other people besides you?

Daniel Thomas (06:35):

Uh, I think she spoke to s- s- um, I think she would have might potentially spoke to, to Tom [inaudible 00:06:39]. I d- I don't, I can't say for sure, but I know that they, they spoke a lot. I know that he w- he was aware that she was looking at moving to the United Kingdom, um, but I'm not entirely sure who, who else would, would have, would have had that information. But I would say Tom p- potentially.

Gregg (06:54):

And, um, do you remember her friend that came with her [inaudible 00:06:56]?

Daniel Thomas (06:56):

Cla- [Clarie 00:06:57]? No. Um.

Gregg (06:56):

Does, does Trisha ring a bell?

Daniel Thomas (07:06):

Tr- Trisha. Yes. Trisha. Yeah.

Gregg (07:08):

And did she speak-

Daniel Thomas (07:08):

Trish. Yeah.

Gregg (07:09):

... did she speak about similar plans?

Daniel Thomas (07:10):

N-

Gregg (07:13):

Did you ever speak with her afterwards?

Daniel Thomas (07:13):

... Well, Trisha used to contact me, uh, because I never used to s- write. When I started, obviously, coming away from Lisa, she started contacting me about Lisa, saying, you know, "Don't you realize what you can have?" And all of that.

Daniel Thomas (07:26):

But she n- never really went into what Lisa told me. She just talked about trying to get me to ring Lisa. And I remember clearly on Valentine's Day, she was going, "Lisa's crying her eyes out because you haven't rang her. You haven't spoken to her." And all this. But actually about that, no.

Gregg (07:39):

Okay. And so there's some, uh, text messages that, that we've seen, but do you have any other communications with her like, uh, WhatsApp or, uh, you know-

Daniel Thomas (07:54):

No. No. I mean-

Gregg (07:56):

... [crosstalk 00:07:56].

Daniel Thomas (07:56):

... Uh, no. I've changed phones t- a few times since then. My number's still the same, but, uh, the WhatsApp messages are, are not, are not there, because they're not restored.

Gregg (08:06):

Right.

Daniel Thomas (08:07):

I had to delete everything, obviously, with, uh, with what happened.

Gregg (08:10):

Yeah. (laughs) yeah.

Daniel Thomas (08:12):

And, and (laughs) you know, uh, she, she, she ter- you know, she, she, she [inaudible 00:08:16] upon herself for three to four months, just bombarding [Jaz 00:08:20], uh, with information about what would happen between us. Uh, um, so I, I had to delete Lisa out my life in, in its entirety. Um, yeah.

Gregg (08:26):

Can you be a little bit more specific of how she... Y- You said in your, in your email that, uh, your message, that she, um, tortured you and she enjoyed it.

Daniel Thomas (08:39):

Yeah. So what, what, what she would do is i- is, is send, uh, she wouldn't send everything at once. So she kept Jaz hanging, hanging by a thread, knowing that there's more. So she would al- she would send the WhatsApp messages, and then she would say, "But I ca- I'm not going to send you the rest until another day." Um, uh, she would send pictures. Um, uh, talk about, she used to talk about the positions, the sex positions that we used to do. And she'd talk about, you know, and, uh, it's, it, uh, all that type of stuff.

Daniel Thomas (09:09):

And, and, and when I say she ruined my life is the fact that she, she psychologically, uh, damaged Jaz by knowing that Jaz want, would want to know everything, but not telling her everything at once, waiting and over time sort of torturing her into, into, into speaking to her about it. And then actually manipulating her into pretending that she was her friend, uh, and talked about bringing Jaz over to America.

Daniel Thomas (09:35):

And, um, and then there was, um, obviously, in, I've got to be honest, there was a, there was a situation in Brussels that happened where, um, I mean, this is quite difficult to talk about, but I want to be honest, I, I'd have very rough sex with Lisa and, uh, she ended up having a black eye from it. And I don't remember it.

Daniel Thomas (09:52):

And I felt like I think she had put something in my drink or done something because I, I've never blacked out. Woke up the next morning, and she's got a black eye. And she's saying during sex, I somehow gave her a black eye.

Daniel Thomas (10:03):

And obviously, she was relaying that information to Jaz. Uh, it was, it was, she was just so weird at the end of it. I, I just couldn't work out what she was trying to gain from it, but she was torturing Jaz on a daily basis and then trying to be her friend [inaudible 00:10:17] and then [inaudible 00:10:17] her something to sort of like, everything will be fine. Everything will be fine. And then suddenly, she'd bring something back up. It was just, it was very bizarre. [inaudible 00:10:25] whole thing's just very bizarre.

Gregg (10:28):

I'm sorry. Uh, I'm sorry about, um, that you had to go through all of this. I appreciate you sharing this with us. Um, (laughs) it hasn't-

Daniel Thomas (10:42):

But she had it in for you, Gregg. She had it in for you. From, from the time we ever spoke about you, she wanted your job. And then when she realized she couldn't get the job or something, then she wanted to go down the route of destroying you, destroying you and making loads of money from it. I had many conversations about that with her, um, over that, so that w- that's definitely something that was, uh, was definitely on her, on the plate from very early from me speaking to her.

Gregg (11:04):

... So, um, you know, would she, did she just kind of bring it up out of the air, or was, you know-

Daniel Thomas (11:13):

No. Sh- She, she wanted to move to the United Kingdom after we had become... and she s- she said she had a plan to make enough money to make that happen. She said her hus- she didn't want to be with her husband anymore.

Daniel Thomas (11:22):

She didn't, she, she's very bizarre regarding her children. She's, you know, she used to say, "I don't really miss my kids." And I, and I [inaudible 00:11:28] that was just, like, in my head. It was very bizarre that someone would say that about their own children, that she goes, "Oh, you know, I don't, I, I don't really miss them. I, I'm glad I'm here." N- And then, you know, I'm going to get a house. I've got a plan. You know, I've got a way of making... and then she, that was, that was the initial thing.

Daniel Thomas (11:43):

And then, it went into, well, what are you going to do? Well, you know, Gregg, Gregg. I'll say Gregg's done this, Gregg's done that. And then I'm going to take it to court and get, and they'll have to pay out. They'll pay me loads. They'll pay me loads, and then I'll have enough money to do whatever the hell we want to do.

Daniel Thomas (11:56):

Um, so it was basically talking about a plan of moving over here, and then that developed into explaining what she was, how she was going to do it to make the money, to get the money.

Gregg (12:04):

What did she, how did she say she was going to do it?

Daniel Thomas (12:09):

It was on the basis of saying that you tried to sexually assault her.

Gregg (12:10):

That's, uh-

Daniel Thomas (12:13):

So, yeah.

Gregg (12:15):

... [crosstalk 00:12:15] that sounds familiar. (laughs)

Daniel Thomas (12:15):

Yeah.

Gregg (12:15):

There were some other accusations [crosstalk 00:12:17].

Daniel Thomas (12:17):

And she, from, from my, from me knowing, knowing her for that period of time, you could tell that she's, she didn't care who got hurt or what, what were lies and what was the truth. She just wanted the money. She wanted to move away from the United States and come into the United Kingdom. And she said that to Jaz many a time. I'm going to be moving to the United Kingdom, and you can't get rid of me. Every, all sorts of stuff. So, um, yeah. It was, it was a plan from ver- from very early to, to, to make a load of money and to come over.

Gregg (12:48):

And so some of the text messages that we've been able to see, um, and Danny, I've got to tell you, we're not interested in anything dealing with what you might have done, what you didn't do. This is, this is about people who are saying some pretty bad things about it, so-

Daniel Thomas (13:01):

Yeah.

Gregg (13:02):

... you know, it, the release of everything here is, is that, you know, maybe she had a conversation with you. Maybe she didn't. Whatever. We're just trying to get to the truth here. So she, um-

Daniel Thomas (13:12):

Yeah.

Gregg (13:14):

... she, in a text message, says that there may have been money which was misappropriated from the Middle East Forum for a vacation that you took in Ibiza. Now, I, I want to preface this, again, saying that if, if-

Daniel Thomas (13:27):

Yeah. This-

Gregg (13:27):

... i- i- if it happened, it happened. It's the past.

Daniel Thomas (13:29):

... [crosstalk 00:13:29] what I was [inaudible 00:13:31] in Ibiza the day I received the 30,000 has got nothing to do with the money. That, that holiday, that, that [inaudible 00:13:37] my uncle was planned two or three months before we even went. It happened just to be that the 30,000 was in my account on the day that I had gone to Ibiza.

Daniel Thomas ([13:46](#)):

Now, I was very, very, in contact very closely with Tommy, and Tommy's, uh, Tommy's crew or, or team about this money and about where it was going. Um, let's be honest. I mean, you know, the, the 95% of that money went exactly where it meant to go, but I looked after my family.

Daniel Thomas ([14:03](#)):

I looked after my family, and I knew, because I wasn't being paid a penny from anyone to the work that I did, the amount of time and effort I put into the [inaudible 00:14:11] movement and all the events and all, all the preparations and the police and talking to, you know, the secret service in, in Holland [inaudible 00:14:17] and talking to all these things, and I didn't have a job. So obviously, there was, there was money, 5% of that, that would have gone to me, gone to my family.

Gregg ([14:25](#)):

Okay.

Daniel Thomas ([14:25](#)):

So, and that's the truth. I've got no issues-

Gregg ([14:28](#)):

No. No. That's-

Daniel Thomas ([14:29](#)):

... with telling you.

Gregg ([14:29](#)):

... that's, that's, that's, that's fine. Do, do you think that Lisa would have tried to cover up that knowledge from us? Did she ever say that to you?

Daniel Thomas ([14:39](#)):

Uh, sh- well, she was always going to s- yeah, because obviously, she was in, she told Jaz that she was in love with me and that she, when she, um, be, on that basis, when she knew that I'd spent some of the money, she said that there w- you guys wouldn't find out. Not from her, anyway.

Gregg ([14:54](#)):

So she actively tried to, I don't want to put words in your mouth, but she-

Daniel Thomas ([14:57](#)):

Okay.

Gregg (15:00):

... actively knew about something that she said she didn't want the Middle East Forum to know, and she actively covered that up?

Daniel Thomas (15:15):

So on the lines... Wait. One second, babe. Sorry. I've just got my children screaming. Can I give you, can you give me 30 seconds?

Gregg (15:15):

I, I'm in the same, I'm in the same boat, man. I've got my three downstairs [crosstalk 00:15:17].

Daniel Thomas (15:17):

(laughs) Just give me, just give me 30 seconds. I'll be back. Yeah? 30 seconds. (silence)

Daniel Thomas (16:08):

Oh. Yeah. Sorry. I'm back. So, um, yeah. So Lisa knew that I had had a few thousand pounds and, and she knew that it didn't go where it was supposed to go. And she said that she would make sure that they, you guys didn't find out.

Daniel Thomas (16:23):

And she actually threatened me with saying that she was going to try somehow, when I was, I told her I didn't want to be with her anymore, that she was somehow going to make it come out and fuck my life up and get me, uh, you know, using that as a, as a way of trying to keep me in contact with her.

Gregg (16:38):

So she was trying to extort you to stay into a relationship?

Daniel Thomas (16:42):

Yes. 100%. 100%.

Gregg (16:50):

Now, did she ever, you know, she, she left her job with the Middle East Forum in, um, August of 2019, and she went to go work for a member of Congress.

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Gregg: There's some messages that we have which, uh, basically say, you know I'm a member of con... I'm [inaudible 00:00:07] a member of congress I have influence. Was there anything, like I don't wanna put words in your mouth again-

Daniel Thomas: No, no, no.

Gregg: ... did she ever.

Daniel Thomas: No, no. It- it- it- it- it- it, not to me but I- I think to- to Jas she- she, you know she- she's now in the p... Jas said that she thinks she's now in the pos... power of position. Position of power and that um.... Because I, because I obviously, I- I told Jas everything about how she was and how manipulating she was, and how [00:00:30] she's tried to blackmail me to, into staying with her. And then obviously Jas then contacted her, and you know I know about this, I know about that. And then Lisa used to, you know three o'clock in the morning she'd be drunk in- in Vegas or wherever the hell she was, and she would say "Do you know who I work for now" and all this. And you know "You wanna fuck with me Danny, you wanna fuck with me Danny I'll fuck you, I'll fuck your life up, you don't know whe- who I'm working for". So she mentioned it that- that, yeah. But not- not like specific things, that, just blasé saying, [00:01:00] you know, I'm in a position of power, if you wanna fuck with me you- you try.

'Cause I was saying this is crazy, I was saying she is, she's fucking nuts. And I was try... I was telling that to Jas and Jas was writing to her saying Danny's told me you're absolutely crazy bla bla bla and she's like, yeah. So that [inaudible 00:01:12] I used to get drunk phone calls telling me that she was now a high ranking member of whatever, and that if I wanted to fuck with her she would ruin my life even more.

Gregg: So she- she tried to instill a sense of fear in you?

Daniel Thomas: Ah, and I was, because I was losing my family. I was losing everything because of her. [00:01:30] And she's get [inaudible 00:01:32], it wasn't where she was just contacting Jas and telling her everything, she was staying in contact with her, and using it as a way of making sure that mine and Jas' relationship would never, would never resume as normality because she kept contacting her, oh by the way did you know, did you know. So, strange, very strange. Strange individual.

Gregg: Did you ever think of blowing the whistle on Lisa and telling [inaudible 00:01:59] about it?

Daniel Thomas: Well Jas did yeah, Jas, I think Jas, Jas, 'cause I remember Jas [00:02:00] con... tried to contact you, and tried to tell you, and h- Lisa s- told me that she had to run into your office and take the, take the voicemail off your phone.

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Gregg: She took the voicemail off my phone?

Daniel Thomas: Yeah. So you had a, o- o- in your office, I'm guessing that you had a voice note-

Gregg: Yeah.

Daniel Thomas: ... voice, uh, thing from Jas saying, you know, she's doing this, she's doing that. And then Lisa found out and went into your office and- and deleted it off your phone.

Gregg: So Lisa actually, are- are there any other instances that you know about about Lisa and her victims, uh, provision of information [inaudible 00:02:31] [00:02:30] about what?

Daniel Thomas: Um. Not off the top of my head, that was one that sort of sticks out. Um, but, I know, I don't, I- I, no. No, not at this time no. Not that I can think of.

Gregg: Okay. Um, so Jon and Sid are- are the, I'm just the guy asking the questions tryna figure out what happened here, but Jon and Sid are the ones who know the- the law and whatever else, you mind if they ask a few questions?

Daniel Thomas: Of [00:03:00] course, no problem.

Gregg: Uh Sid?

Sid: Sure. Um, in terms of the timeframe, are you able to, um, when you say she called Jas and made it clear to her that she had this position with the congress person. And you also mentioned that she also says that to you, that she has this power now that she's hooked up with this person from the congress, can you recall when that conversation took place?

Daniel Thomas: I'd have to speak to Jas, and I am seeing her tonight. [00:03:30] I can uh, I can, I- if you, if Gregg writes me these questions on a, on WhatsApp I will get... because Jas will know more than me. She- she her- her brain was so sub, you know so baffled, like done by it that she will remember. I, off the top of my head I can't if I'm honest.

Sid: W- w- when- when is the, when is the last time you heard from Lisa?

Daniel Thomas: Probably... du, du, du, du, du, February, this year.

Sid: This year, what was that, what was the, what was that conversation about?

Daniel Thomas: Uh it was [00:04:00] actually about Lisa trying to threaten that she was gonna tell people that I'd beaten her up in a hotel in Brussels.

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Sid: Mm. What- what happened with that by the way, there's conflicting stories about what happened in Brussels with these-

Daniel Thomas: Well I've got, I- I mean yeah. I mean I- I- I- I- I've got, um, people that she's spoken to that she, oh it- it was just rough sex. Uh, we'd been drinking with- with some politicians throughout the night, I'd obviously drunken a lot, I don't, never blacked out before in my life. [00:04:30] And then suddenly woken up and Lisa's at the hospital, and I actually, to this day, you know I'm not sure, but I- I can be certain that she hit herself, and then made out that I'd hit her-

Sid: Wow.

Daniel Thomas: ... to- to- to have that, to have that hold over me. And I'm telling you now, she's capable of that. A hundred percent because I just, 'cause she's said to, I- I don't want to go into detail it's a bit weird but, sh... you know I- I- I when I get rough having sex I never clench my fist, I you, you know I- I- I've- I don't, and to have that sort of injury [00:05:00] that it looked like it just didn't make sense at all to me. And then she woke up she went "No don't worry about it [inaudible 00:05:06], just make sure you don't, you look after me now, make sure you look after me and don't leave me", and I was thinking oh hold a minute. You- you've seen me fallen asleep and you thought of something, because I told her that night that this was, this was gonna be the last time that I would see her.

Um, and then she said well, and then- then February, in February where she was talking to Jas she was saying "Well Danny be careful". Because I was telling Jas that she's nuts and Jas was relaying that, and she said "Danny be careful 'cause I'll tell everyone that you- you beat me up in hotel room in Brussels". Yeah but you know [00:05:30] that's not true Lisa. "Yeah but it doesn't matter, people will think, will think that. Think about what your life will be like after that". So, yeah. Crazy.

Sid: When she, when she, when she was in Brussels did she have her children there?

Daniel Thomas: No. No, no, no.

Sid: One other question, when- when she was, when- when she was threatening you and, about the fact that she didn't want it to get back to Gregg and whatever the story was, did she mention that she had, uh, uh, either solicited or [inaudible 00:05:55] some other women to [inaudible 00:05:57] file claims against Gregg as well?

Daniel Thomas: [00:06:00] No.

Sid: Do you know the name Trish, uh, Patricia [McNoldy 00:06:03]?

Daniel Thomas: Yeah I've met her.

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Gregg: That's the one that, uh, had that [inaudible 00:06:06].

Sid: Just tell me, what- what, did she ever reference her in terms of she's gonna make a claim also or, you know or s- words to that effect?

Daniel Thomas: I can't recall. Can't recall.

Sid: How about, how about, um, [Marnie 00:06:20] O'Brien. Does that name ring a bell [inaudible 00:06:23]?

Daniel Thomas: [Marnie 00:06:23] O'Brien, is that, isn't that the woman that does the, deals with the money?

Gregg: Yeah yeah-

Daniel Thomas: In the-

Gregg: ... she's the controller.

Daniel Thomas: [00:06:30] Yeah, that name does ring a bell, she did something was something about that but I couldn't recall exactly what, I'm not sure if it was about allegation. But I, I know the, no. I- I- I can't, I don't wanna say it 'cause I can't remember, but I know that name was mentioned.

Sid: Did she ever tell you that she actually filed a formal legal complaint against, uh, against Gregg, and the, and the [inaudible 00:06:49]?

Daniel Thomas: She said that that's- that's the- the end. When- when- when all this is over, the Tommy stuff is all over, that's what's gonna happen, she's gonna file a sexual complaint, a sexual [00:07:00] assault complaint against Gregg, to- to get money out of them [inaudible 00:07:03] just to set her life up. Here in the UK.

Sid: So, so I think you said that when you got the cheque for 30 grand, 95% of it went for Tommy's, you know-

Daniel Thomas: Yep.

Sid: ... area, but you kept 5% of that money for yourself?

Daniel Thomas: To move my family out of a-

Sid: Yeah.

Daniel Thomas: ... out of, out- out- out of of a place I, we were living in a, in a flat, in a tiny flat in the middle of a very horrible area, and I used 5% of that money to move my family into a house.

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Sid: Was she, was she aware that you [00:07:30] had retained that 5%?

Daniel Thomas: Yes.

Sid: Okay. And, um, did, when she learned that you had kept the 5% what did she say exactly? If you can recall?

Daniel Thomas: Well I can't remember exactly what she said but I know on a basis of her saying that, you know you did the right thing, you moved your family out and I- I'll make sure they don't find out.

Sid: Yeah. Did she ever tell you that, that there was a, she ever bring that issue up again? [inaudible 00:07:53] I think you talked about trying to-

Daniel Thomas: She [00:08:00] thre-

Sid: [crosstalk 00:08:02].

Daniel Thomas: She, yeah she. Yeah but- but she- she, it- it was for... it was brought up, but it- it was ended pretty quickly because she knew that she- she'd sort of participated in making sure that you guys didn't find out.

Sid: Oh really?

Daniel Thomas: And- and she- she's- she- she, um, she was sending me money all the time.

Gregg: She sent you money?

Daniel Thomas: Oh she sent me thousands of [inaudible 00:08:14] pounds.

Gregg: Really?

Daniel Thomas: Yeah yeah yeah. Yeah. To keep me like, keep me, she, when- where, she- she paid for the flights, uh the- the, sorry the- the Eurostar to Brussels, I, she paid for my Christmas in- in 2000 and uh, in 18 she sent me a thousand pound. She was, she was giving me her credit card when I was in [00:08:30] Brussels. I was using, I, she was, yeah, yeah.

Gregg: Did she uh-

Daniel Thomas: And that, yeah.

Gregg: Did she, uh, ever ask you for receipts?

Daniel Thomas: No, no, no.

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Gregg: You know we have an email, we have an email that your father, Russell Thomas, sent to her-

Daniel Thomas: Yep.

Gregg: ... in November of 2018.

Daniel Thomas: Yep.

Gregg: Uh, did she ever respond to him?

Daniel Thomas: I think so. I think she did yeah, I thought, I, again I can ask that question.

Gregg: [crosstalk 00:08:56], did you get that email?

Daniel Thomas: I could ask, I can find out. I can find [00:09:00] out.

Gregg: All right. We'll put this, we'll put this all in writing.

Daniel Thomas: Yeah if-

Gregg: [crosstalk 00:09:02].

Daniel Thomas: ... you can just give me a summary of what you want-

Gregg: Yeah.

Daniel Thomas: ... in a, in a WhatsApp and uh, and I'll get on it.

Gregg: I just wanna say thank you for speaking with us, I feel like-

Daniel Thomas: No, no problem.

Gregg: [crosstalk 00:09:06] talking.

Daniel Thomas: Yeah. It, you- you're dealing with a very- very special specimen of woman with Lisa. She's a very-

Sid: (laughs).

Daniel Thomas: Yeah. You really are. And I've never met someone that, you know she's- she- she- she- she's capable of, of a lot, and she doesn't care who gets hurt in the process. Um, yeah, so.

Sid: When- when you were, when you were with her, this is uh [inaudible 00:09:30] [00:09:30] again, did she ever do any drugs, or-

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Daniel Thomas: Yes.

Sid: ... making her just.

Daniel Thomas: Yes.

Sid: What kind, what kind [crosstalk 00:09:35]?

Daniel Thomas: Cocaine. Cocaine, all the time. All the time.

Sid: Cocaine?

Daniel Thomas: Yeah.

Sid: Do you think she was a cocaine addict?

Daniel Thomas: Right every time we were, every time she, I saw her, every time we were out, she would ask me to get in and we would do cocaine all night.

Sid: And how, in- it [inaudible 00:09:50] of doing it every night we [inaudible 00:09:51], what were the quantities that were purchased? We talking like uh [crosstalk 00:09:55]-

Daniel Thomas: Three, four grams.

Sid: Three, four grams?

Daniel Thomas: No, three, so- so- so you're talking maybe three to four hundred [00:10:00] a night. Pounds.

Gregg: So about five, six hundred dollars worth of cocaine every evening?

Daniel Thomas: Yes.

Sid: Was she talking another, any other medicine [crosstalk 00:10:12]?

Daniel Thomas: Yes, um, some- some- some- some- some type of, um, pills that were on the basis of making you feel like you were on, sorry bare with me one second, give me [00:10:30] 10 seconds, give me 10 seconds.

Sid: [crosstalk 00:10:48].

Daniel Thomas: Mason.

[00:11:00] Yeah hi sorry I'm back. Kids, they've got, I've got, I've got full custody of my three- three young children so, uh, my life is, uh, crazy right now.

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Sid: Ah.

Daniel Thomas: [00:11:30] But um, yeah, yeah I know. But um yeah prescription, she had a- a cocktail of prescription, not- not prescription 'cause they weren't. She said she had a, uh, someone that could get this stuff for her and it was like, um, it would make you feel like you're- you're taking, uh, cocaine. It was a white bottle. She used to have quite a lot of it, but in bottles that were, that were prescribed, like written like paracetamol or ibuprofen, but insider were these- these tablets. And she used to get, she was addicted to them. Every day. Every day.

Sid: [00:12:00] We talking painkillers, we talking, um.

Daniel Thomas: Uppers.

Sid: Uppers.

Daniel Thomas: So-

Sid: Uppers.

Daniel Thomas: Yeah.

Sid: Uppers. Okay. Um... all right well, I, Gregg is there anywhere you wanna [inaudible 00:12:13], you tell me [crosstalk 00:12:13]-

Gregg: No, um, Jon- Jon is on the phone, I think he's muted. I don't know if Jon has any questions?

Jon: Uh I unmuted. Um, the only thing I would ask, uh Danny, and- and I'll echo Gregg in saying we very much appreciate all of the time and help.

Daniel Thomas: Yeah, [00:12:30] no problem.

Jon: Is, was it, when Lisa would talk about this plan to- to come up with money from the Middle East Farm in order to move over to- to the UK.

Daniel Thomas: Mm-hmm (affirmative).

Jon: Was it, was it always sort of the same approach, or did it ever change, would she ever come to you and say, something happened with my plan over the weekend and I made progress? Or, you know, oh it's, we had a setback? I mean did she ever say anything more to you than just, I'm gonna get money from MEF by claiming Gregg [00:13:00] assaulted me?

Daniel Thomas: It- it, the story never really changed, the concept of the story never really changed. It was always she was waiting for the right time. She said that she was, she, thi... She wanted to see where things were, how things were gonna

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progress going though. Um, but she said that things, yes there were times where she said things- things said something. She never went into detail what- what she was on about, but she used to say that, oh I'm close to it, you need to tell me if- if you're gonna be move in with me, I need to do this soon. It was always that, it was, [00:13:30] it was the head of the conversation because she was trying to make me aware that I, she was so serious about this, and that she was talking about buying me a cars and- and taking me on like exotic holidays, and- and trying to yeah. But it- it was always the same concept but she- she always seemed very... Towards the end she seemed very panicked about it. About tryna get me to agree to be with her because the plan was about to be executed.

Jon: Got it. Got it.

Daniel Thomas: Yeah, yeah.

Jon: Um, and, so a- along those [00:14:00] same lines, did it feel to you like, and I apologize if I'm sort of re-stating what you've already said, but did it feel to you that like she was, she was kind of dangling this in front of you as an inducement to continue in the relationship?

Daniel Thomas: Absolutely. 100%. 100%.

Jon: Okay.

Daniel Thomas: And that was what the money, the money the- the money thing. You know, uh, I would talk about [inaudible 00:14:24] I can't do this, my kids I- I don't, I can't leave my kids. It's like look, look, look, let me send, I'll send you a thousand, [00:14:30] a thousand right now, go and get yourself something nice and all this. You know it was, it was that- that, towards the end it was all about trying to pay me off to stay with her, because-

Jon: Got it.

Daniel Thomas: ... she couldn't be in- in, she said when- when- when the plans comes together she said she doesn't want to be in the United States. She wants to take the money and she wants to come away from the United States. Um, so she was trying, uh, establish having a boyfriend, having a life, in the United Kingdom so that when the e- plan was-

Jon: Yeah.

Daniel Thomas: ... executed, yeah, yeah, okay.

Jon: Got it. That makes perfect [00:15:00] sense to me. That- that's the main thing that I had. Sid covered the rest of what, uh, I had notes to ask, so.

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Daniel Thomas: Cool.

Gregg: Danny, if we put this in writing, would you be willing to sign your name to it?

Daniel Thomas: Uh, it depends what, I mean again Lisa's a very dangerous individual for me, and uh, I mean, potentially, I mean I- I- I- I, the reason I- I'm helping you is because she, my- my girlfriend is, well my ex-girlfriend is so damaged by Lisa. [00:15:30] M- my, she has to go to counseling because of Lisa. It's that damaging, the- the impact that Jas... that Lisa had on Jas because I didn't want to be with her was, it's effected not just her but my children, my lifestyle. And to a point where Jas has actually become addicted to drugs, has now lost her children and I have full custody. Um, and that's all based on- on- on Lisa. And I would, um, so going back to would I sign it, I'd have to think about it. I'd have to think way up the- the- the, more, I would say 70/30 [00:16:00] I would sign it. [crosstalk 00:16:02].

Sid: Can I ask, I have a question for you. How about if we, uh, had a conference call with Zoom. Would you be, and we asked you these questions under oath, would you have any problems giving a statement under oath?

Daniel Thomas: Again, if you give me 24 hours to think about it, weigh it up, talk to Jas.

Sid: Okay.

Daniel Thomas: Um, but- but I- I don't, I probably would yeah. Yeah.

Sid: Okay good good. That's fair, that's fair.

Daniel Thomas: She- she- she needs to be, she needs to be stopped from what she's doing. She's a horrible, horrible person, [00:16:30] um, and- and- and if I can help to bring the truth to light without damaging myself and my family any further then I w- I will do that.

Sid: Great. Well thank you.

Gregg: Danny, thanks a lot. And listen-

Daniel Thomas: No problem.

Gregg: ... these guys are, uh, they'll be in touch.

Daniel Thomas: Sure.

Gregg: If there's anything else but, yeah. Uh, hopefully when this is all over we uh talk under better circumstances.

Daniel Thomas: Yeah sure. Sounds good.

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Gregg: [00:17:00] All right thank you very much.

Sid: Thanks.

Jon: I appreciate your time Danny. Thank you.

Sid: No problem, I'll speak to you soon. Take care guys. Bye bye.

Gregg: Bye bye.

EXHIBIT 82
Deposition of
Marnie Meyer

In the Matter Of:

MARNIE O'BRIEN

VS

MIDDLE EAST FORUM

Marnie O'Brien

January 14, 2021

Wilcox & Fetzer

1330 King Street

Wilmington, DE 19801

email: depos@wilfet.com, web: www.wilfet.com

phone: 302-655-0477. fax: 302-655-0497



Marnie O'Brien - January 14, 2021

93

1 you sure about that?

2 And he was like oh, I don't
3 know, maybe.

4 It was, it was weird.

5 Q. When you say it was before that,
6 you mean it was before Lisa's comment
7 to you?

8 A. I think it was.

9 Q. Okay. And then it says "Soon
10 after her trip to Israel," which I'm
11 assuming means Ms. Barbounis's trip to
12 Israel, "in March of 2018 Mr. Roman
13 asked you to document everything
14 Ms. Barbounis did wrong while working
15 for the Forum, including when she was
16 late or when she spoke too loudly.
17 Ms. O'Brien was directed by Mr. Roman
18 to look for reasons to discipline
19 Ms. Barbounis."

20 Is that a true and accurate
21 statement?

22 A. It is.

23 Q. Tell me the context of that.

24 A. So --



EXHIBIT 83

Message from Plaintiff

From: Lisa Barbounis
Sent: Tuesday, October 30, 2018 3:47:27 PM
To: Gregg Roman
Subject: Today

Gregg,

In response to what happened today I wanted to let you know what has transpired and how I am feeling.

I took this job because I was told it was flexible and there was a great culture here. What has transpired over the last year has been anything but. I am constantly monitored and micromanaged.

Today around noon I was having a conversation about the Tommy Robinson event with Tricia prior to our call. I shut the door because I am constantly being reprimanded for being loud and was trying to be respectful. (I would like to note that the only person who has an issue with my loudness is Marnie) Marnie proceeded to ask Matt why we were in my office with the door closed making a big deal about nothing. This is not the first occurrence. I am constantly monitored and singled out about my time in the office.

I take a shuttle to the office in the morning and it does not always running on schedule. I also have two small children that occasionally make morning departures difficult. But you can guarantee that once every two weeks Marnie calls me in her office to speak to me about my time. She claims you view her as a manager and she needs to deal with people being late. Conveniently forgotten are the late night, weekend, early morning hours spent working at home. You has always said not to be concerned about time as long as the work is being done.

I feel that Marnie targets me and has made it her mission to "reel me in" because she has said as much. Additionally, when others are being loud no one, including Marnie, ever says a word to them. As a prime example, yesterday as I was writing a letter for Lord Pearson multiple people were outside my office being incredibly loud. I said nothing, and Marnie said nothing. However, today when I was irritated about a work situation and finished my sentence as Tricia walked away, of course Marnie didn't wait two seconds to come into my office and reprimand me. I repeated these same concerns I am stating now - that she only targets me. She proceeded to march into Matt's office and tell him he "has a big mouth" and left the office slamming all the doors on the way out.

I know that I am being targeted. We have one employee who comes in late and leaves early every single day, and no one says a word. When others are loud no one says a word. There is a clear and obvious double standard and I am becoming very uncomfortable. I am held to one standard and everyone else is held to another.

We all know that this is not the first occurrence of her singling me out. I am fearful that with Marnie as the HR person my job is in jeopardy. I believe this because when after we were in your office talking about my position a few weeks ago Marnie said to me "you are lucky its not me because I would not have given that to you". She also said, that she told you, that you should "deal with my attitude before offering me any additional work". I can't work with my HR manager acting as my boss and monitoring every little thing I do.

I have no recourse because my issue is with the HR manager.

Sincerely,

Lisa Barbounis

Executive Liaison

[Middle East Forum](#)

O: 215.546.5406 x102

C: 215.910.2154

F: 215.546.5409



Please subscribe to our newsletters [here!](#)

EXHIBIT 84

Message from D. Pipes

21 November 2018

DP

08:26

Daniel Pipes

I am not happy about Tommy's Proud Boys connection: <https://tellmamauk.org/tommy-robinson-to-tour-australia-with-the-leader-of-group-fbi-deems-extremist/>

Could you look into them a bit and assess this.

LB

09:47

Lisa Barbounis

I just looked into them myself the other day. To be honest I think they are getting a bit of a bad wrap. Some of it deserves some of it not there certainly not affiliated with white nationalists. Apparently they hate white supremacy. However, some of the tactics are not good.

That being said I spoke to tommy. He said he is absolutely not affiliated with the proud boys and thinks they're ridiculous. He is friendly with Gavin McInnis because they both worked at Rebel and he called off his Australia tour where Gavin was supposed to be an additional speaker.

DP

09:58

Daniel Pipes

That's good news. In general, could you gently caution him that our continued support requires him to stay away from the nasties.

LB

09:59

Lisa Barbounis

Absolutely. We had a long talk already about a few other things I asked him to tone down.

10:00

Sorry for the typos in the longer message. I was using talk to text feature and didn't go back and look it over

22 November 2018

LB

17:30

Lisa Barbounis

Hope you are having a happy thanksgiving. I wanted to see if you saw the Laura Loomer Twitter ban. She is a bigot but her tweet wasn't. She is banned permanently. Another added to the De-platformed.

17:30

EXHIBIT 85
Email from R.
Thomas to Plaintiff



Russell Thomas <rmthoma... Fri, Nov 23, 2018, 6:11 AM
to Barbounis ▾



Dear Lisa,

Ref: My son Danny Tommo (Daniel Thomas)

Firstly, it's a pleasure to correspond with you.

I have been observing the sterling work you and your organization have been doing in supporting Tommy Robinson and his UK movement.

I would like to discuss a sensitive issue with you, sensitive because Daniel doesn't know that I'm contacting you. Earlier this year, Daniel and I opened an office in Portsmouth offering Internet marketing. Our business is actually 13 years old, the new office was to allow Daniel to develop our business further. The business was developing very well, that is until Daniel with my agreement became involved with the movement to free Tommy. He became very focused on the task of helping and organizing various events.

To cut a long story short... The office closed in October this year.

I think Daniel found the Tommy movement so important even additive that eventually he neglected his paid work with the obvious result.

Daniel has a wife and three children, my grandchildren. He is dedicating himself to the developing movement but at the financial detriment of his personal life. I know you have recently financially helped him which is much appreciated, however, Daniel needs, or more importantly his family needs some kind financial stability.

Would it be possible for you to arrange some form of 'regular' financial assistance directly to Daniel or perhaps to his wife?

Daniel is a very proud individual, perhaps he's finding it too difficult to admit to the people around him of his predicament.

I do hope you can help and once again it is a pleasure corresponding with you.

EXHIBIT 86
Email from Plaintiff
to R. Thomas

On 23 November 2018 at 13:23 Lisa Barbounis <lisabarbounis@gmail.com> wrote:

Dear Mr. Thomas,

The pleasure is all mine and I thank you for your kind words regarding our work.

I have been working closely with **Danny** since the end of May and have come to know him rather well. **Danny** is a great person dedicated to the cause and he has been doing great work.

I am aware of both the previous business endeavor and **Danny's** current financial situation. Unfortunately, our organization has a narrowly defined mission that prevents us from getting involved with the **Tommy** project more broadly. Our mission is to protect Western values from Middle Eastern threats. The reason we supported the **Free Tommy** campaign was because it was specifically related to the censorship of those who criticize Islam. I, too, am dedicating personal time to the overall cause.

That being said, acutely aware of **Danny's** situation, I came up with a plan to get him started. Our organization does provide grants. **Danny** and **Tommy** are working on a documentary program that fits within the scope of our work. I believe my organization would fund/partially fund the project. **Danny** is supposed to be submitting a proposal for the project to me by today. I have agreed to edit, format, and help them submit it to our organization and to others in the US. Hopefully, I can help get the project funded in the next two weeks. Albeit the funding is highly likely it's important to understand there is no guarantee.

I noted that **Danny** is unaware that you have contacted me. Is it your request that I keep our correspondence private? It may be helpful for him to hear from a third party how concerned his family is. Please advise.

I truly appreciate your desire to help your family and I promise you I will do all I can to help **Danny**, his wife, and children.

Sincerely,

Lisa Barbounis
Executive Liaison
Middle East Forum
www.meforum.org
+1 215-910-2154

EXHIBIT 87

Guardian Article



UK Independence party (Ukip)

● This article is more than 2 years old

Anti-Islam activists get key roles in 'family-friendly' Brexit march

Josh Halliday *North of England correspondent*

Fri 7 Dec 2018 11.00 EST

A “proudly anti-Islam” Australian activist and a YouTuber who sent a rape tweet to a Labour MP have been handed prominent roles at a “family-friendly” **Brexit** rally due to take place in London on Sunday, the Guardian has learned.

Avi Yemini, who described Islam as a “**barbaric ideology**” that had taken over England and described Muslim countries as “**Islamic sh**holes**”, has flown from Australia to cover the event on social media at the invitation of Tommy Robinson, the activist who is organising the event alongside the Ukip leader, Gerard Batten.

Yemini's attendance is being funded through online donations in partnership with the Canadian far-right website the Rebel Media, which previously employed Robinson.

Ukip has insisted the rally will be a family-friendly demonstration against what it called "the great Brexit betrayal" being pursued by Theresa May's government. But the Guardian has learned that one of the key confirmed speakers is a man who has accused opponents of "acting like a bunch of [N-word]" and sent a rape tweet to the Labour MP Jess Phillips.

Carl Benjamin, 39, who uses the alias Sargon of Akkad, is a political commentator who has gained more than 860,000 subscribers on YouTube by making videos criticising feminism, **Islam** and political correctness. He joined Ukip in June as part of the party's attempt to attract internet-savvy supporters.

The prominent roles of both men at the rally will alarm those inside Ukip who have expressed growing unease about the party's relationship with Robinson and his associates.

Nigel Farage quit Ukip this week after 25 years, blaming its anti-Muslim "fixation", while the former deputy chair Suzanne Evans, the former leader Paul Nuttall, and MEPs Patrick O'Flynn, Bill Etheridge and William Dartmouth have also quit following Batten's decision to appoint **Robinson as an adviser**.

Robinson, whose real name is Stephen Yaxley-Lennon, has been raising funds for this Sunday's "Brexit Betrayal" rally by emailing supporters directly, asking for donations towards the £8,000 cost of stage and sound equipment.

Several members of Batten's inner circle are closely involved with organising the rally, which is due to begin outside the Dorchester hotel and end outside Downing Street. Robinson posted a picture on Instagram from a planning meeting last week which showed the Ukip leader alongside his personal assistant, Liz Phillips, his adviser Lawrence Webb, and the party's head of communications, Kris Hicks.



▲ A meeting of the 'Brexit Betrayal' rally organisers in late November. Photograph: Handout

A senior executive of the Middle East Forum, an influential US thinktank which helped bankroll Robinson's legal fight and protests, was also at the meeting and has been closely involved in rally preparations, the Guardian has learned.

Lisa Barbounis, the executive liaison officer to the MEF president, Daniel Pipes, is expected to attend the rally. She previously addressed crowds outside the Old Bailey after Robinson's most recent court appearance.

Middle East Forum Speech - Old Bailey - Tommy Robinson Support



▲ Barbounis addressing crowds in London earlier this year

A Ukip spokesman confirmed Barbounis' involvement in the meeting and said she was "just recording the meeting to report back to them [the Middle East Forum]". He said the MEF were "very interested in the topic Tommy Robinson discusses and Brexit and the future prospects of the country".

However, Pipes denied the forum was "in any way connected" to the Brexit rally. Barbounis was in London "on her own initiative and attended the planning meeting in a personal capacity", he said.

One senior Ukip insider described the rally as "crazy" and said 200 members had quit the party on Friday night in protest at its association with Robinson. "If it all goes wrong, and I think it will, then Gerard should walk or be pushed," the insider said.

Benjamin gained notoriety in 2016 when he was accused of instigating a misogynistic trolling campaign against Phillips, the Labour MP for Birmingham Yardley. "I wouldn't even rape you," he tweeted at Phillips, reportedly prompting hundreds of threatening tweets against her, including rape and death threats from his followers. He has since been banned from Twitter.

In a livestream recorded in February, Benjamin appeared to lose his temper at commenters. "You are acting like a bunch of [N-word], just so you know. You act like white [N-word]," he said. Benjamin insisted his comments had been taken out of context.

Yemini, who describes himself as "proudly anti-Islam", gained more than 100,000 followers on Facebook after posting inflammatory videos, before being banned from the social network earlier this week.

The Israeli-born activist says he was a sniper in the Israeli Defence Forces and that he served in the Gaza Strip. He is standing in upcoming elections for the far-right Australian Liberty Alliance party, which has acknowledged donating to Robinson in the past.

His arrival in Britain was welcomed by Daniel Thomas, who was jailed for two years in 2016 for attempted kidnap and is organising the rally with Robinson and Ukip. He posted a picture of Yemini on social media with the message: “My favourite Nazi Jew Avi has arrived #SundayFunDay #TheGreatBetrayal”.

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It won't be easy. Misinformation, white nationalism, and crackdowns on voting rights remain clear threats to American democracy. The need for fact-based reporting that highlights injustice and offers solutions is as great as ever. In 2021, the Guardian will also continue to confront America's other longstanding problems - from the climate emergency to broken healthcare to rapacious corporations.

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Support the Guardian →

Remind me in April



EXHIBIT 88

**Messages between
Plaintiff and D. Pipes**

Lisa Barbounis

18 April 2018

DP

14:50

Daniel Pipes

I worked on it

19 April 2018

DP

18:01

Daniel Pipes

Dennis Ross replied: Sorry to miss it, I will be out of town.

24 April 2018

DP

16:48

Daniel Pipes

I put in my office days, every Friday from May 11 to June 15.

26 April 2018

DP

19:48

Daniel Pipes

Hi. Unless I have it wrong, we have two interviews at the same time, 2:00-2:30 tomorrow: Todd Bensman and Michael Fechter

LB

19:49

Lisa Barbounis

I will double check the schedule with Thelma in the morning. She made all of the arrangements.

DP

19:49

Daniel Pipes

thanks

LB

19:58

Lisa Barbounis

I just searched back through the emails. Michael Fechter was unavailable for tomorrow and asked to reschedule for Monday.

19:59



19:59

I believe this is the schedule for tomorrow.

DP

20:36

Daniel Pipes

Ah, Fechter is next Tuesday

9 May 2018

DP

12:58

Daniel Pipes

Are we serving any food at 2 PM?

LB

19:11

Lisa Barbounis

I'm sorry I just saw this. I knew you were looking for food and had Samantha send it over. I hope you got it.

DP

20:46

Daniel Pipes

thanks, I did.

10 May 2018

DP

16:02

Daniel Pipes

Lisa Barbounis

Cancelled

16 May 2018

12:25

Daniel Pipes

Hi, did my suitcase come back from the shop?

LB

12:26

Lisa Barbounis

Yes. I believe it's in your office.

DP

12:26

Daniel Pipes

thanks

17 May 2018

DP

18:02

Daniel Pipes

Lisa Barbounis

Outgoing (30 seconds)

29 May 2018

DP

16:23

Daniel Pipes

Hi, I can't find Stacey on Telegram, could you ask her to contact me here?

LB

16:29

Lisa Barbounis

I will contact her now

LB

16:47

Lisa Barbounis

I left her a message on her cell phone and sent her a text message. Please let me know if can be of assistance.

DP

16:48

Daniel Pipes

Thanks. I want to make fundraising calls but none of the Salesforce links are working.

LB

16:51

Lisa Barbounis

Matt is going to resend the email. Please let me know if the new links work.

16:52

If not, let me know what error message you are receiving and we will troubleshoot.

DP

21:03

Daniel Pipes

tried the first one, still does not go through.

21:03



21:03

for the Becker Foundation meeting: let's at least consider TWI

21:04

sorry, that' smeant for Gregg

21:04

The Becker bit

LB

21:08

Lisa Barbounis

We will get it to work. I sent the error message to matt and Stacey

30 May 2018

LB

13:53

Lisa Barbounis

Lisa Curtis

5 June 2018

LB

12:32

Lisa Barbounis

The corner bakery is located at 1701 JFK blvd. I apologize for the error

12:33



12:33

The internet had the incorrect location address

7 June 2018

LB

16:21

Lisa Barbounis

Dr. Pipes. Gregg mentioned you may want to cancel lunch tomorrow. I am just confirming so Tricia can cancel the order.

DP

19:29

Daniel Pipes

It's now back on. Sorry for the trouble. Let's say 12:30.

LB

20:45

Lisa Barbounis

Thank you. See you tomorrow

9 June 2018

DP

14:48

Daniel Pipes



DP:43

Daniel Pipes
your assessment of the day?

LB

16:50

Lisa Barbounis

Good crowd given the police were preventing people from entering. I would estimate 10k. They wouldn't allow the big screen that was supposed to be behind the stage through the crowd. Wilders also had trouble getting through, so he spoke late. His speech, Liam Tuff's and Raheem's really got the crowd going. For the time we were there, it was very peaceful.

I am very disappointed in the media coverage. Most are saying the event was cancelled. It appears as if they would have long reported had it gone terribly wrong.

DP

16:59

Daniel Pipes

Thanks for the report. I was wondering about the screen. Once the violence began, so did the media coverage, which is pretty huge at this point.

For comic relief: <https://metro.co.uk/2018/06/09/tommy-robinson-protesters-naked-bike-riders-accidentally-merge-glorious-7619017/amp/>

19 June 2018

DP

12:26

Daniel Pipes

If you one, could I get a schedule of meetings in Israel? I am so focused on Poland (22 meetings) and Hungary (9 so far) that I am passive about Israel

LB

12:47

Lisa Barbounis

Rachel is working on it as we speak. I just sent out additional requests. I will likely have a final draft for you by Friday. If you would like the current meeting schedule I can send that to you incomplete.

DP

13:27

Daniel Pipes

yes, if you could sent me the schedule every few days, that would be helpful

13:27

*send

LB

13:28

Lisa Barbounis

I will be sure to do that
11 July 2018

LB

14:48

Lisa Barbounis

Dr. Pipes,

Raheem sent me the following message regarding Geert Wilders. Gregg asked that I forward it to you.

Geert: "UK Ambassador in The Hague just informed the Dutch authorities that they will not provide for my security in London this Saturday and will not give the Dutch diplomatic police weapon permits either, so unfortunately I cannot attend nor speak at the FreeTommy rally in London."

DP

14:50

Daniel Pipes

thanks

1 August 2018

DP

19:40

Daniel Pipes



LB

19:42

Lisa Barbounis

Thank you! I'm so happy he is out. As an aside, I have been tracking the social media influence and we are at 29.5 million views for Tommy Robinson and MEF!

DP

19:43

Daniel Pipes

You are kidding

LB

19:43

Lisa Barbounis

No! I'll show you the charts tomorrow.

19:44

I believe Sam's USAID piece has around 2 million

DP

21:57

Daniel Pipes

<https://twitter.com/DanielPipes/status/1024796011603128322>

LB

22:03

Lisa Barbounis

I heard he might have been on Tucker tonight. I'm staying up to see.

22:04

When I was there everyone around him had nothing but praise for you and your support for Tommy.

DP

22:07

Daniel Pipes

nice to hear.

2 August 2018

LB

20:46

Lisa Barbounis

Tommy just thanked MEF on Tucker

DP

20:58

Daniel Pipes

how great. Can you find it online?

LB

20:59

Lisa Barbounis

It's not on yet but my friend is a com director at the RNC. She gets me clips all the time. I'll ask her to pull one for me.

DP

20:59

Daniel Pipes

thanks

21:28

LB
Lisa Barbounis

<https://youtu.be/mdZZD89ucoI>

21:28

It's now online

DP

21:28

Daniel Pipes

thanks

LB

21:28

Lisa Barbounis

It's not his best interview.

DP

21:37

Daniel Pipes

he has so much to say, he needs an hour.

LB

21:38

Lisa Barbounis

I agree. There is so much more to the story.

DP

22:03

Daniel Pipes

<https://twitter.com/DanielPipes/status/1025199672921604096>

3 August 2018

DP

15:59

Daniel Pipes

the 9th could work for me

LB

16:00

Lisa Barbounis

Ok, I will let him know. Gregg is supposed to be in Pittsburgh that day but we may be able to move his meetings around.

DP

16:01

Daniel Pipes

or early on 8th.

16:01

ie, could stay the night of 7-8 in DC

7 August 2018

DP

13:11

Daniel Pipes

Lisa, Do you know what version of Windows we have on the computers?

DP

13:30

Daniel Pipes

7. Found it

17 August 2018

DP

12:09

Daniel Pipes

<https://alliancebernstein.com/library/Whos-Giving-and-Where-Giving-USA-Survey-Review.htm>

LB

17:04

Lisa Barbounis

Dr. Pipes,

I wanted to ask, out of my own curiosity, if your term civilizationist parties (which I really like) has any root in Huntington's Clash of Civilizations theory.

I hope I'm not bothering you.

21 August 2018

DP

16:28

Daniel Pipes

<https://nyti.ms/2wdTbB7?smid=nytcore-ios-share>

28 August 2018

DP

20:48

Daniel Pipes

<https://apnews.com/8ed1460be6af4ee3a81df4e2215611b2>

4 September 2018

DP

16:16

Daniel Pipes

Could I get a final list of the attendees tomorrow?

LB

18:15

Lisa Barbounis

Tricia just sent it over

27 September 2018

DP

13:35

Daniel Pipes

Send me the conference call code again?

LB

14:34

Lisa Barbounis

I'm sorry. For some reason I got this notification late! It just came over now.

10 October 2018

DP

06:48

Daniel Pipes

Even the military goes after Tommy.

06:48

<https://www.theguardian.com/uk-news/2018/oct/09/uk-army-investigates-tommy-robinson-poses-with-soldiers>

LB

07:01

Lisa Barbounis

I spoke to him yesterday and he said two young soldiers were let go for having their picture taken with him.

DP

07:42

Daniel Pipes

astonishing. Is there a news item on this?

LB

07:53

Lisa Barbounis

Not yet. They are contacting him directly and asking to remain anonymous. However he sent me screenshots of what they are saying. I think it's three so far. This morning one of them said they are having racism training and more are being discharged.

08:01



08:01



08:03



08:03



LB

18:33

Lisa Barbounis

Update. One of the soldiers that took a selfie with Tommy is being discharged. A group of them are meeting with Tommy tomorrow. They are talking about taking a group stance saying if you are going to discharge him then discharge all of us.

DP

19:49

Daniel Pipes

Good for them

17 October 2018

LB

10:25

Lisa Barbounis

I am working on your travel arrangements. Do you prefer to fly business?

DP

10:34

Daniel Pipes

Of course - but we're a nonprofit, so it's economy.

Would like to take UA where possible, then AA. Return Saturday about 5pm please

LB

16:18

Lisa Barbounis

We are waiting for the credit card to be unlocked to book the flights and hotels.

Are we booking them under your name or an alias?

DP

Daniel Pipes

Mine. You can use my UA CC

LB

16:20

Lisa Barbounis

Is there a copy of that in your office? Marnie does not have a copy.

DP

16:22

Daniel Pipes



727

LB

16:28

Lisa Barbounis

Thank you.

18 October 2018

DP

10:23

Daniel Pipes

where are we with the reservations, please?

LB

10:32

Lisa Barbounis

I actually just sent you an email with the final times. I left for class last night at when you sent your card and was there until 9:30. Took care of a few immediate things this morning and began working on your travel again. Should be all set to go within the next hour hotels too. Sorry for the delay.

10:33

Is the billing address for the card the office billing address -1650 Market?

10:34

I will also need your birthdate and frequent flyer number if you have one.

DP

10:35

Daniel Pipes

wait, don't book till I have a chance to look it over. I travel a lot and am full of preferences and dislikes.

LB

10:37

Lisa Barbounis

Matt did sent me the aisle preferences and hotel preference

LB

14:45

Lisa Barbounis

Did you have a chance to find the rewards number? I will also need the other credit card when you get a minute. Thank you.

DP

14:50

Daniel Pipes

UA BE467440

14:50

AA CC 5466160263568691(278), 1/20

14:51

1650 is the address

LB

14:52

Lisa Barbounis

Thank you.

14:55

Do you like or dislike exit rows?

DP

14:56

Daniel Pipes

Like very much, especially the back one where the seat reclines

14:56

or bulkhead

14:56

please register me for upgrades - I have lots of those certificates

LB

14:57

Lisa Barbounis

Ok.

15:10

Delta frequent flyer if you have one?

DP

15:10

Daniel Pipes

[6315552387](https://www.facebook.com/danpipes6315552387/)

23 October 2018

DP

19:22

Daniel Pipes

Looking forward to a report on the Tommy Robinson activities

LB

19:23

Lisa Barbounis

There is a lot to report. I will certainly write it up. I just left them.

DP

19:25

Daniel Pipes

thanks

26 October 2018

DP

17:02

Daniel Pipes

your picture here too: <https://inews.co.uk/news/world/tommy-robinson-latest-news-invited-us-address-congress-members/>

LB

17:02

Lisa Barbounis

Thanks!

1 November 2018

DP

18:30

Daniel Pipes

what is the name of the intern? Leah?

LB

18:31

Lisa Barbounis

Lea Merville

DP

18:31

Daniel Pipes

thanks

5 November 2018

DP

14:03

Daniel Pipes

Wednesday flights?

LB

14:04

Lisa Barbounis

I will send them to your email in a few minutes

14:05

There is a 2:12pm and a 3:40pm United out of Philadelphia. Both are \$367

DP

14:06

Daniel Pipes

arrival times?

LB

14:08

Lisa Barbounis

Departure- Arrival

2:12-5:17pm

3:40-6:46pm

DP

14:09

Daniel Pipes

2:12, please

LB

14:10

Lisa Barbounis

On your united card?

DP

14:10

Daniel Pipes

yes

14:11

see if you can salvage anything from the canceled flight that morning from Detroit. If you need to call UA, I have a super number

LB

14:22

Lisa Barbounis

Only seat available 3:43-5:21

14:22

I can recoup costs

DP

14:23

Daniel Pipes

that's practically the same arrival time. How can there be two such flights?

LB

14:23

Lisa Barbounis

I'm on the phone

DP

14:23

Daniel Pipes

Good about costs

LB

14:23

Lisa Barbounis

The other was the internet search.

14:27

Sorry. I wasn't more clear.

The original flight out was AA.

AA Has a flight 3:43.

The cost for changing is \$134.

United was a separate flight for 367.

DP

14:28

Daniel Pipes

I also have a good number for AA

3:43 really gets in at 5:21?

LB

14:30

Lisa Barbounis

That's correct. I'm looking at the flight now. Duration 2h38m

LB

19:14

Lisa Barbounis

I just wanted to thank you for the opportunity to work on the website. I don't think I was clear enough in my appreciation. This weekend was very long and the whole day was a lot to process. It's very kind of you to make room for me to stay on. Thank you.

DP

19:37

Daniel Pipes

It's not kindness. You are skilled and devoted. I hope you will help the organization grow. That said, you're welcome

6 November 2018

DP

12:15

Daniel Pipes

Come by and tell me about Tommy Robinson event, please

12:24

I ended Chris Wall's role at MEF. So, the articles are now in your hands

DP

14:49

Daniel Pipes

When you have a moment, give me your counsel on the Ruptly reporter at Tommy Robinson

LB

15:14

Lisa Barbounis

When you have an opportunity will you please send me Prager's contact information?

DP

16:07

Daniel Pipes

[Dennis Prager](#)

[+32 364 69 84 8 - vCard](#)

LB

16:48

Lisa Barbounis

Thank you.

DP

17:08

Daniel Pipes

Skip that #, though

LB

17:25

Lisa Barbounis

Does the number not work or do you not want me to contact him?

DP

18:31

Daniel Pipes

it's a European number

18:31

Not his

18:32

sorry, it's fine, got messed up: [\(323\) 646-9848](tel:3236469848)

18:32

not +32 but +1

DP

23:08

Daniel Pipes

should Gregg be at the Tommy Robinson event or not?

LB

23:10

Lisa Barbounis

He wasn't planning on going he was supposed to be in CA. He originally said he had no interest in it.

DP

23:12

Daniel Pipes

oh that's right, he's in California.

7 November 2018

LB

15:10

Lisa Barbounis

Prager can't make it to DC

DP

15:39

Daniel Pipes

no surprise

8 November 2018

LB

11:31

Lisa Barbounis

Which of your emails would you like me to include in my response to the Independent?

DP

11:45

Daniel Pipes

Pipes@MEForum.org

LB

12:03

Lisa Barbounis

Ann Marie is a yes

DP

12:04

Daniel Pipes

Great, so we are full up for the 14th.

LB

12:05

Lisa Barbounis

Yes. Since Ann Marie and as her are both coming do you still want to do a dinner on the 13th?

DP

12:06

Daniel Pipes

not following the question

LB

12:06

Lisa Barbounis

And Ezra*

12:06

My auto correct took over.

12:06

Since Ann Marie and Ezra are coming would you like to still do the dinner and invite donors on the 13th?

DP

12:17

Daniel Pipes

what is the connection between the two? The idea is to reward our best donors

12:17

We can talk in a few minutes

9 November 2018

LB

00:12

Lisa Barbounis

<https://www.thedailybeast.com/brits-urge-pompeo-to-keep-violent-bigot-tommy-robinson-out-of-us?source=articles&via=rss>

DP

06:15

Daniel Pipes

2 pieces of news here: about the MPs and about Pompeo. I can't believe that the secretary of state is actually the one making this decision, however

LB

11:06

Lisa Barbounis

Gateway pundit wants to write about the Tommy event. If she tweets it would you like her to link the invitation too?

DP

11:07

Daniel Pipes

sure

LB

13:37

Lisa Barbounis

Peter Weinstein called for you [212-744-7156](tel:212-744-7156)

LB

16:55

Lisa Barbounis

Sprayregen meeting confirmed

DP

16:55

Daniel Pipes

thanks on both

11 November 2018

LB

07:58

Lisa Barbounis

Dr. Pipes. Ann Marie is speaking at DHFC weekend. So they were paying for her flights. We asked if they could look into changing her flight to arrive earlier. Noelle just got back to me this morning and the cost to change Ann Marie's flight is \$2300. I looked into other flights. British airways has a cheaper flight \$1,861. How do you want me to proceed?

07:58



DP

08:02

Daniel Pipes

That's what it would cost for her to join us on Wednesday?

LB

08:03

Lisa Barbounis

Yes. But I don't know why the change fee would be that high unless they are flying her business.

DP

08:17

Daniel Pipes

too much for us. Thanks for inquiring

LB

10:40

Lisa Barbounis

I am working with Ann Marie's chairman of the for Britan Party. He found a flight on Tuesday for £291. She may arrive a bit late to the dinner but it's a significant cost reduction. Can we cover that? I believe it is \$377.66

DP

10:41

Daniel Pipes

That's fine

LB

10:41

Lisa Barbounis

Thank you.

DP:42

Daniel Pipes

Can you tell me when & where the Tuesday dinner will be? Also, do remember to include me on all invitations, so I am not blindsided

LB

11:43

Lisa Barbounis

Dinner Tuesday, November 13 @6:00pm

Charlie Palmer Steak House – 101 Constitution Ave NW, Washington, D.C.

DP

11:44

Daniel Pipes

thanks. Private room?

LB

11:44

Lisa Barbounis

I sent out the invites via email mail merge to over 300 donors.

11:44

Yes.

DP

14:59

Daniel Pipes

That's a lot of potential people to host.

LB

17:07

Lisa Barbounis

They were just touches like we spoke about. I think we had 3 interested but they thought it was in Philadelphia. I had one confirmed from that blast. But we have others.

17:08

Gregg has not responded about mail chimp. I was at the barn most of the day. I saw he sent a message about the radio. Did anyone tell him it was not continuing?

DP

17:25

Daniel Pipes

1. I don't want to micromanage him; come to me if there is a persistent problem.

2. The station considers him a star and is willing to cut the price. I authorized negotiations with it.

17:25

Barn? I did not realize you live on a farm.

17:27

more on 2. We have to give a month's notice, so we're using what we've paid for

LB

17:27

Lisa Barbounis

Noted. I will have Delaney continue to work on the guests and format?

I don't live on a farm. I ride for the UPenn Equestrian team.

DP

17:29

Daniel Pipes

Yes, let's air on the side of continuity. We have enough changes to contend with

DP

18:20

Daniel Pipes

Looks like Gregg replied to you about MailChimp. You satisfied with that?

LB

18:27

Lisa Barbounis

Yes. Thank you.

18:28

Although I was a present in the training courses for the website the email was helpful
12 November 2018

LB

09:44

Lisa Barbounis

Raheem read about our panel and said he was demonetized on YouTube. He is asking to speak.

Currently we have you, Ann Marie, and Ezra.

Avi isn't coming but is sharing on his Facebook like he is attending until tomorrow. Apparently they ran it in a big paper there and the media is eating it up.

Let me know what you think about Raheem.

I have a bio for Ann Marie and Tommy. Working on Ezra.

Also working on the press release

DP

09:58

Daniel Pipes

Raheem is a good idea. Also, please make sure the video to Tommy Robinson is functioning. Too often, these things degenerate into tech fiascoes

10:29

DP
Daniel Pipes

are you getting press coverage for the event?

LB

10:34

Lisa Barbounis

In reply to [this message](#)

Right now I have Breitbart and Gateway and a two others that reached out attending. Once the press release goes out today we will target certain outlets. I will hopefully have the press release done within the hour for your review.

10:35

Tommy and I have a test call set up for tomorrow

DP

13:42

Daniel Pipes

Reuters' Mark Hosenball will be calling you about Tommy Robinson's experience at the US consulate in London. I trust him.

LB

13:43

Lisa Barbounis

Ok. Thank you.

DP

15:36

Daniel Pipes



Have him send us the full article?

15:46

trouble is, we have no idea if Gosar will discuss deplatforming. I will change it

15:47

how about this:

UK firebrand Tommy Robinson and others will discuss the phenomenon of “de-platforming” at an event hosted by Congressman Paul Gosar (R-AZ) and the Middle East Forum on Capitol Hill, Wednesday, Nov. 14.

LB

15:48

Lisa Barbounis

Done

15:48

Avi Yemini to speak in Washington DC

Aaron Langmaid, Herald Sun

9 minutes ago

Subscriber only

Controversial right wing activist Avi Yemini will take his message against radical Islam to Capitol Hill after he accepted an invitation to speak at a free-speech forum in Washington DC.

Mr Yemini, an Australian Liberty Alliance candidate for the Southern Metropolitan region, will jet to the US tonight where he is expected to join a string of conservative advocates for the Middle East Forum highlighting censorship issues.

YEMINI CONFIRMS HE’LL RUN FOR SEAT

CAMPAIGN FOR PEPPER SPRAY TO BE LEGALISED

Mr Yemini has drawn wide criticism for his polarising views on the subject — and was behind a rally in Melbourne’s CBD just 24 hours after the lone wolf terror attack on Friday.

He said the US visit would be an opportunity to highlight how American censorship was being mirrored in Australia.

“The more you try and censor reasonable conversation about the threat of Islam, the more you send people underground and play into the hands of extremists from all sides,” Mr Yemini told the Herald Sun.

Mr Yemini at a rally in Melbourne. Picture: Jake Nowakowski

He said the latest attack in Melbourne demonstrated the need to have open and robust discussion about Islam and its place in Australia.

“These conversations are uncomfortable but absolutely necessary,” he said.

“They try to demonise me for criticising Islam but as we have seen on Friday — everything I have been saying is true.”

Mr Yemini, who patrolled the Gaza border as a soldier in the Israeli Defence Force, has faced fierce criticism for his views on immigration and crime.

Last week, he questioned how Pakistani-born Muslim senator Mehreen Faruqi could campaign against animal cruelty following the death of a runner in the Melbourne Cup, yet fail to condemn halal slaughter practices.

Earlier this year, Facebook closed down one of Mr Yemini's social media pages for alleged hate speech, claims he denied.

The US forum will feature panellist Tommy Robinson, co-founder of the English Defence League, Canadian conservative Ezra Levant and Republican congressman Paul Gosar.

15:49

This is the article

DP

15:50

Daniel Pipes

thanks

LB

16:59

Lisa Barbounis

I just sent a test for the press release to your email

DP

17:35

Daniel Pipes

Looks good

DP

18:51

Daniel Pipes

What are the plans for dinner? I suggest meat-fish-vedge options and wine

LB

18:54

Lisa Barbounis

We have meat and fish with a silent veg option. Tricia had consumption bar, but can add wine service now.

DP

18:56

Daniel Pipes

is a consumption bar = open bar?

LB

18:57

Lisa Barbounis

Yes. I believe there is a minimum for the room and people don't normally abuse it. That's how it was for the KIVC/CIVC DC dinner.

DP

18:58

Daniel Pipes

I am not looking to add to the costs. Shall I ask her for what this will cost?

LB

18:58

Lisa Barbounis

I believe there is a minimum for the room. I can ask her if you like.

18:59

There is a chance tommy can come. I just got this text!

19:00



DP

19:02

Daniel Pipes

1. Please do ask

2. Great!

LB

20:01

Lisa Barbounis

Should we consider booking the latest flight out of London with a 24/hour cancellation? If it doesn't get approved by 12 then cancel?

20:02

Latest flight looks like 5pm their time 12 ours.

20:02

He would have to arrive at the airport by 9am our time

20:02

DP
Daniel Pipes

no 24hr-cancellation when it's under 24 hours. Let's just wait till he hears. What is the development?
Is that text from someone in the USG?

LB

20:03

Lisa Barbounis

From customs and border patrol.

DP

20:03

Daniel Pipes

I don't want to buy a ticket that cannot be returned. Better he be all packed and make his way to the airport. Lots of flights to the US, could go via NYC

LB

20:04

Lisa Barbounis

Right.

20:15

There are a few later flights flying into NYC. I'll have him ready

DP

20:17

Daniel Pipes

It would be big news if he made it. I wonder if the COS would still host him. Not too important, as he would do the MEF, DHFC, and Rebel events

20:17

would be almost a week for Ezra

LB

20:20

Lisa Barbounis

Exactly!

20:22

I spoke to CBP a minute ago and they said they are just looking for the person that does the administrative side for this guy to sign off.

20:22

Hopefully they can locate the person quickly

DP

20:30

Daniel Pipes

what a surprise

LB

20:45

Lisa Barbounis

Until he is on the ground and through customs I wouldn't tell a soul that they approved it.

DP

21:11

Daniel Pipes

Good idea

DP

22:14

Daniel Pipes

Are we live-streaming on Wednesday? We should. I have been asked about this. And we should announce that we are doing so.

13 November 2018

DP

06:23

Daniel Pipes

2. News?

LB

06:24

Lisa Barbounis

Nothing yet. I'm checking in at 7. Spoke to Tommy an hour ago. He will be ready if we need him to be.

DP

06:25

Daniel Pipes

Wild.

LB

06:26

Lisa Barbounis

We are not live-streaming. Both times the sound quality was terrible and Gregg still has the iPad. We are going to record the event and upload it to the website and FB later.

DP

06:26

Daniel Pipes

Ok

06:40

"Bianca from CNN here. Can you confirm whether or not Tommy Robinson will be attending the Middle East forum tomorrow? I've seen reports that you've said his visa wasn't accepted? Any help is appreciated, plus any further details about the event you can send me." How do you want me to reply?

06:45

Lisa Barbounis

He has applied for a visa and that application is in the “administrative processing” phase. He is set to participate at our event via video link.

06:45

I think it’s better if they don’t think he is coming. Less pressure on customs

06:46

We can alert them all that he is here once he is on the ground. That would cause a media frenzy

DP

06:46

Daniel Pipes

Agree about the frenzy. How about:

He has applied for a visa and that application is still in the “administrative processing” phase. He is prepared to participate at the Middle East Forum event on Wednesday via video link.

LB

06:46

Lisa Barbounis

Perfect.

06:49

I have a feeling that if it doesn’t get approved today that it will within the next couple days. If that’s the case he should go to the breakers come back and do an event with Ezra and we should partner.

I also think it would be a good idea, if he missed our event, to Set individual meetings with him and members of Congress videotape him walking through the halls. Write an article. Etc. he will have time after the breakers to come back to DC.

DP

06:50

Daniel Pipes

Good ideas. Maybe COS can reschedule. That is the formal purpose of the visit

LB

06:50

Lisa Barbounis

Absolutely

DP

06:50

Daniel Pipes

Maybe get the visa extended for that purpose

LB

06:50

Lisa Barbounis

I'm all over it.

07:01



DP

07:02

Daniel Pipes

Send a version of what we agreed on

LB

07:02

Lisa Barbounis

Is this the same CNN reporter?

He has not been denied just sent to administrative processing. Between you and I that means background checks

DP

07:02

Daniel Pipes

no, mine was Bianca something

07:13

<https://www.theguardian.com/uk-news/2018/nov/13/tommy-robinson-not-granted-us-visa-in-time-for-washington-visit>

07:14

Odd thing is, Guardian never spoke to me. Reuters did. Guardian does not credit Reuters

LB

07:16

Lisa Barbounis

Honestly, they are all so deceitful

DP

10:07

Daniel Pipes

Could you contact the 4 speakers and tell them to limit their opening remarks to 5 minutes? (I run a tight ship.) And the topic is de-platforming: What their sin was, what the effect was, what they are doing to get around this problem.

10:10

Also, which bank refused AM Waters as a client?

DP

10:27

Daniel Pipes

I realized that I am a panelist too - my O2 problem: <http://www.danielpipes.org/blog/2016/11/uk-internet-provider-o2-blocks-me>. So, we are five.

LB

10:28

Lisa Barbounis

Ann Marie is on a plane but I'll message her and her chairman who is accompanying her

DP

10:28

Daniel Pipes

I can add it last minute

LB

10:59

Lisa Barbounis

BBC: Any further statements or information you can provide would be greatly appreciated.

DP

11:00

Daniel Pipes

send it to me

LB

11:00

Lisa Barbounis

I was going to respond:

Mr. Robinson has applied for a visa and that application is still in the "administrative processing" phase. He is prepared to participate at the Middle East Forum Capitol Hill event on Wednesday via video link.

Mr. Robinson has received additional invitations to speak in the US and will likely have another opportunity to brief the Conservative Opportunity Society at a later date.

But I will send to you.

11:01

Sent

DP

11:01

Daniel Pipes

no, that's fine. BUt indicate COS is House of Representatives

DP

16:50

Daniel Pipes

TR news?

LB

17:02

Lisa Barbounis

Not making it tonight. No answer from CBP

DP

17:13

Daniel Pipes

Could you reply to Polina Leonovich? She wrote me again

LB

17:34

Lisa Barbounis

I actually just did

LB

20:30

Lisa Barbounis

Were you happy with the evening?

DP

20:30

Daniel Pipes

Yes, well done.

14 November 2018

DP

07:07

Daniel Pipes

You wrote to the journalist "Should you have any additional questions feel free to contact Daniel Pipes at Daniel.Pipes@meforum.org."

Please note that's an dummy account The correct one is Pipes@MEForum.org.

LB

07:08

Lisa Barbounis

Yes, that was a mistake. I realized that when I sent it. Would you like me to respond to Lizzie?

DP

07:08

Daniel Pipes

I am doing it

LB

07:09

Lisa Barbounis

Ok. I started and was going to send you the draft. Thank you and let me know if you need anything for today.

DP

07:09

Daniel Pipes

Here is my draft:

Could I please confirm whether it will be going ahead via video as planned,

Yes, shortly after noon today in Washington, DC.

and whether the speech will be broadcast publicly?

Yes, but not live-streamed because of a problem with our equipment.

I saw your comments to Reuters, but for clarity it would be great to confirm whether his visa request is still pending or has been refused.

It is pending; we expect he will receive a visa before long.

LB

07:14

Lisa Barbounis

Reuters misquoted me by 2 words. He was asking questions about a section of the typical visa denial that I was extremely familiar with. He was not so familiar.

I planned to say to Lizzie:

Mr. Robinson will be participating in our panel discussion live via video link. The event will be recorded and uploaded to our website and social media at a later date.

Mr. Robinson's visa was not denied. His application is still in the "administrative processing" phase and we are confident that he will be granted entry to the US at a later date.

DP:15

Daniel Pipes

It is being live-streamed? I thought not

LB

07:16

Lisa Barbounis

It's not being live-streamed. He will be participating live, as in not prerecorded.

DP

07:17

Daniel Pipes

Right, that's what you wrote. Add "from the UK" to be more clear. Otherwise fine to send

LB

07:17

Lisa Barbounis

Thank you.

DP

10:55

Daniel Pipes

Send attendance list?

LB

10:56

Lisa Barbounis

Sent

15 November 2018

DP

10:27

Daniel Pipes

MO please

10:27

<https://www.gatestoneinstitute.org/13299/erdogan-charm-offensive>

LB

10:30

Lisa Barbounis

Will do.

DP

17:49

Daniel Pipes

you sent me [Test] In the Middle East, You Win with Fear?

17:50

It has to mention his MEF affiliation

17:50

drop the jiss.org.il

17:50

otherwise fine

17:50

subject line should name the author

DP

20:48

Daniel Pipes

new Inbar looks good

LB

20:48

Lisa Barbounis

Will send

LB

22:15

Lisa Barbounis

Test sent

22:16

Picture not correct. I'll adjust

DP

22:17

Daniel Pipes

k

22:17

the pictures need captions. I'd prefer that the top one be in the text

22:17

Standingg

22:17

the font is awfully bi

22:18

Big

LB

22:20

Lisa Barbounis

I was putting the pictures that corresponded with text. I'll switch them. I mimicked the last press release. The font is all the same size and Georgia. I'll work it out and send another

LB

22:59

Lisa Barbounis

Sent

DP

23:28

Daniel Pipes

sent back

16 November 2018

DP

11:36

Daniel Pipes

the Atkinson note: what precisely am I being asked about? Your going there, our paying for your going there, our supporting the Brussels event more broadly?

LB

11:38

Lisa Barbounis

Two separate issues.

1. She is submitting a proposal for MEF support of her TV project.

2. She has invited me to speak in Brussels regarding conservative voices being shut down

11:39

I believe I am her guest. Her paying

11:47

I guess I'm asking if I can speak on behalf of MEF at her event. Especially if she is paying. I would clear anything I say with you first. Her and I had lengthy conversations so I'm assuming that's why she thinks I'm capable of doing it. I feel like it would be a good opportunity for me and MEF.

DP

11:48

Daniel Pipes

2. That's easy, sure.

1. This is not what the AD has commissioned me to use his funds for, so I could possibly help with a specific program or project but not with the station as a whole.

LB

12:05

Lisa Barbounis

Thank you! I will pass along the other information

DP

13:49

Daniel Pipes

1. I am surprised to receive anything pertaining to the c4 at MEForum.org. I thought there has to be a Chinese wall. Am I wrong?

2. Is there a specific reason why he is asking if we will proceed with the c4?

3. I raised the first funds for the c4 (100K), so it is proceeding.

LB

13:56

Lisa Barbounis

I always thought there needed to be a Chinese wall, too. However, originally Gregg asked me to coordinate any paperwork for the C4 that was necessary. These are the attorneys that were helping startup so I assumed they thought it was acceptable.

I also thought Gregg launched the C4 on Thursday so this email confused/surprised me. Is he using a different law firm?

DP

13:57

Daniel Pipes

Let me ask Gregg what's going on - using personal e-mail accounts, as we always do.

14:06

just recalled Gregg's new idea of not setting up our own c4 now but using someone else's initially.

LB

20:25

Lisa Barbounis



20:26

New development. We tried to boost Cliff and Sam's article and Facebook is now requiring a review authorization process. We haven't had this happen to us before. We requested the review and I will keep you updated

DP

20:46

Daniel Pipes

Thanks

LB

21:38

Lisa Barbounis



21:39

This is how the font appears on my phone. It looks normal on the email page, too.

DP

21:52

Daniel Pipes

okay, go for it and let's hope for the best

17 November 2018

DP

16:16

Daniel Pipes

Nice piece in the UK Spectator

16:16

<https://spectator.us/tommy-robinson-america/>

18 November 2018

LB

21:43

Lisa Barbounis

I will certainly let tommy know about the breakers and I can also relay your advice about sticking to what he does best. Do you think he should not get political?

DP

21:44

Daniel Pipes

thanks. I endorse his political activities. I am just skeptical about Brexit, which hardly bears on his issues.

21:46

LB

If he throws a march and 100,000 people turn up it could make a significant impression.

DP

21:47

Daniel Pipes

no doubt. But why not a march about Asia Bibi?

LB

21:47

Lisa Barbounis

That's a great point!

DP

21:48

Daniel Pipes

It's an incredible scandal and it can easily be reversed. Brexit is mired in immense complexities and hard to see what a march can accomplish

LB

21:52

Lisa Barbounis

Completely agree with that point! The brexit march would simply be a show of force.

I'll speak to him about Bibi tomorrow. We speak often usually about his visa and US plans but we are friendly, too.

DP

21:56

Daniel Pipes

Good

19 November 2018

LB

19:44

Lisa Barbounis

Tommy is not making it just a brexit march. He is calling it The Great Betrayal and is planning to highlight the Bibi case, grooming gangs, brexit, and other similar issues. Batten has signed on and the response is looking great. They asked me to come and offered for me to speak.

DP

20:06

Daniel Pipes

that makes more sense. Glad you've found a role for yourself with the Brits. They do need help.

20 November 2018

LB
14:18

Lisa Barbounis

I know Marnie just spoke to you about my trip to London. Tommy's funding has been cut with PayPal so he is not paying for speakers. He will pay for my flight. I was wondering if MEF could cover my hotel. I'll can pick up my own expenses? I think if I speak it will be good exposure for MEF. You and I could go over what you think the best topic is.

DP

16:31

Daniel Pipes

Your thoughts on Jacob?

LB

16:39

Lisa Barbounis

I really liked his personality. He's nice, confident, well educated, mild mannered. I was not super impressed with his European answers but that's not his specialty. He also does the typical walk the line DC thing but that could simply be because that is what he is used to. And you seem to be more of a bomb thrower than he is.

That said, when we spoke in my office we touched more on Congressional affairs. We agreed that MEF needs a bigger presence on the Hill. I think it's very good that he knows how the Hill works. I think that was a weak spot for Gregg and this guy gets it.

It's hard to give an assessment without knowing his particular role.

DP

22:59

Daniel Pipes

thanks for this; he would be intellectual/editor.

Got the Burak piece. Looks good but please drop those paragraphs at the top in the future.
21 November 2018

DP

08:26

Daniel Pipes

I am not happy about Tommy's Proud Boys connection: <https://tellmamauk.org/tommy-robinson-to-tour-australia-with-the-leader-of-group-fbi-deems-extremist/>

Could you look into them a bit and assess this.

LB

09:47

Lisa Barbounis

I just looked into them myself the other day. To be honest I think they are getting a bit of a bad wrap. Some of it deserves some of it not there certainly not affiliated with white nationalists. Apparently

they hate white supremacy. However, some of the tactics are not good.

That being said I spoke to tommy. He said he is absolutely not affiliated with the proud boys and thinks they're ridiculous. He is friendly with Gavin McInnis because they both worked at Rebel and he called off his Australia tour where Gavin was supposed to be an additional speaker.

DP

09:58

Daniel Pipes

That' s good news. In general, could you gently caution him that our continued support requires him to stay away from the nasties.

LB

09:59

Lisa Barbounis

Absolutely. We had a long talk already about a few other things I asked him to tone down.

10:00

Sorry for the typos in the longer message. I was using talk to text feature and didn't go back and look it over

22 November 2018

LB

17:30

Lisa Barbounis

Hope you are having a happy thanksgiving. I wanted to see if you saw the Laura Loomer Twitter ban. She is a bigot but her tweet wasn't. She is banned permanently. Another added to the De-platformed.

17:30



DP

18:35

Daniel Pipes

thanks, you too. I did know of the ban but had not seen the wording, which is helpful

18:45

LB

Lisa Barbounis

News on Twitter is that she is now also banned from Facebook

23 November 2018

DP

09:06

Daniel Pipes

major news from UK about UKIP and Tommy Robinson.

09:06

and Farage

LB

09:06

Lisa Barbounis

I'm all over it. Since 3am

DP

09:07

Daniel Pipes

doing what?

LB

09:08

Lisa Barbounis

They were just calling me telling me what was happening. That the believe the people will stick with Gerard. Raheem seems to think this will be the end of Gerard.

09:09

I've also been following the story on twitter and under the BBC and Sky news tweets the comments are more favorable towards Tommy than Farage.

09:16

I was also reinforcing that he need to watch his behavior. He can't been seen anymore as a street activist. That sentiment was reinforced by Farage's comments

DP

09:19

Daniel Pipes

End of Nigel, you mean?

LB

09:19

Lisa Barbounis

Tommy and Gerard think it will be the end of Nigel. Raheem thinks it will be the end of Gerard.

09:20

What are your thoughts?

DP

09:25

Daniel Pipes

I am inclined to think Farage is out of touch. Worrying about the Polish plumber but not jihadis makes no sense

LB

09:25

Lisa Barbounis

I'm hoping you are right. You usually are.

DP

09:40

Daniel Pipes

Hoping too.

Could you take down that pinned tweet about UNRWA at [@MEForum](#)? Ancient history

LB

09:46

Lisa Barbounis

Yes.

27 November 2018

DP

00:17

Daniel Pipes

I've been asked for Tommy Robinson's contact information from an MEFEF grantee that wants to give him a prize. Can you give it to me?

LB

00:40

Lisa Barbounis

[+44 7729 634251](#)

00:40

tommy2711robinson@icloud.com

00:41

I hope it's a good prize!

28 November 2018

DP

12:54

Daniel Pipes

Yes, prestigious and money attached

1 December 2018

DP

13:19

Daniel Pipes
you around?

LB

13:26
Lisa Barbounis
I'm out to dinner In London. I should be done shortly.

DP

13:34
Daniel Pipes
London. Wow. Could you send out a press release soon?

13:35
You should put your travels in the calendar

LB

13:35
Lisa Barbounis
Absolutely.

13:35
Will do.

13:35
I have my laptop in my bag

13:36
For some reason I thought you knew I was coming. My apologies if I didn't.

DP

13:37
Daniel Pipes
You told me something, yes, but life is full and fast. I barely remember my own schedule

LB

13:38
Lisa Barbounis
The press release is it done or do you want me to write it?

DP

13:38
Daniel Pipes
working on it, will send it to you shortly
13:49
!news-MEQ 100th.docx
Not included, change data exporting settings to download.
20.5 KB

13:49
I am waiting for Judy to post the new issue

13:51

LB

Im putting it in the staging site Let me know when you want it to go live

DP

13:52

Daniel Pipes

please always read things for typos, errors

LB

13:53

Lisa Barbounis



13:59

Reading the first paragraph, the phrase “marking the conclusion of 25 years of publication” might come across as a bit confusing. When I first read it I thought “wait, is MEQ done?”

DP

14:02

Daniel Pipes

ok

14:03

!news-MEQ 25 years.docx

Not included, change data exporting settings to download.

20.5 KB

14:03

new version, better counting

LB

14:08

Lisa Barbounis

Should Reuters be italicized?

DP

14:08

Daniel Pipes

no.

LB

14:08

Lisa Barbounis

Just checking

DP

14:08

Daniel Pipes

Aymenn is trying to reach you.

14:09

I would like the new issue up today so it can be referenced in the press release

LB

14:09

Lisa Barbounis

I just sent him a message about an hour ago. We were going to meet here

14:09

Ok. I'll ask Judy if it's ready to go.

DP

14:09

Daniel Pipes

Is this it? <https://stage.meforum.org/middle-east-quarterly/issue-archive/2019/winter-2019>

14:09

Judy is online

LB

14:10

Lisa Barbounis

Yes that's it.

14:11

I can push them through at almost the same time.

DP

15:05

Daniel Pipes

please add the link to the new MEQ issue when you have it and then send out the press release

15:07

you're ahead of me. Needs a space before the final paragraph, starting with "As"

15:07

the paragraph below the line is centered, looks odd. Should be left justified,

15:08

date should not be in bold

15:09

and this obviously should not be there: August 01, 2018

15:09

send the test to me next time?

LB

15:11

Lisa Barbounis

I can send another test. Now that I'm looking at it we usually send her the line and the text below it.

Do you want me to justify everything or center the line?

I'll send you a test when you let me know

DP

15:12

Daniel Pipes

don't right justify

15:14

got it. Looks fine. Would like the first date eliminated, if you can but if you cannot, it's okay for now.

LB

15:15

Lisa Barbounis

Done.

DP

15:15

Daniel Pipes

good to go then

2 December 2018

LB

11:05

Lisa Barbounis

Tommy is writing another book and would like to publish it in the US. Do you have any recommendations for publishers

3 December 2018

DP

00:41

Daniel Pipes

Here's a curious idea: He go with the same publisher as Anne Marie Waters did.

4 December 2018

DP

21:17

Daniel Pipes

I asked for a response to the Guardian questions by 5pm Philadelphia time today. Its now after 9pm.

LB

22:45

Lisa Barbounis

I just woke up to my email mortifications on my phone. I don't know why my earlier email didn't go through. I should have checked it moved out of my inbox. I attempted to send it 4pm my time.

22:45

Notifications*

22:47

It wasn't even close to a proper draft it needed Greggs input on Nina and donor funding.

7 December 2018

DP

09:53

Daniel Pipes

Lisa, urgent e-mail for you to reply to

LB

09:54

Lisa Barbounis

Ok

10:08

I am here on my own initiative and attended the planning meeting in a personal capacity. True. And technically I'm contributing in an advisor capacity.

DP

11:12

Daniel Pipes

please call me

11:13

I could not accept it. Calling you

LB

11:13

Lisa Barbounis

I just rang you

DP

11:15

Daniel Pipes

Rebooting the iPhone

LB

11:16

Lisa Barbounis

Just let me know when

9 December 2018

DP

22:53

Daniel Pipes

awaiting your reply to my several notes

10 December 2018

LB

09:45

Lisa Barbounis

I honestly have been so busy with the march that I haven't had the opportunity to respond from my computer and wanted to give it the attention it deserves. I just got to the airport and will respond as soon as I get sorted. Sorry for the delay.

DP

09:49

Daniel Pipes

I have the sense that your position at MEF is distinctly less important than your activities with Tommy Robinson. This is not good.

LB

09:54

Lisa Barbounis

Honestly that isn't the case. It's the opposite. I was just in an awkward situation over the weekend with limited access to my computer and wanted to reply thoughtfully. Please don't think that. Im back to work and focused on MEF.

It's been a stressful few weeks with the Gregg transition and learning new job functions not to mention finals and my family.

MEF and it's mission mean the world to me. I deeply apologize if it doesn't appear that way at the moment.

DP

09:56

Daniel Pipes

I am glad to hear that but you can see why, what with the transition and the new job functions, your taking off for such a long period to do unrelated work gives me the impression that MEF is a low priority. Especially as you did not indicate that this will be happening, nor give me a decision. You just did it.

LB

09:59

Lisa Barbounis

I can see why you would feel that way. And all I can do is apologize and do better. The Tommy stuff was something I was good at. I finally felt like I was contributing. I can see why it looks the way it does. I guess I got carried away. I thought I was doing the right thing. Certainly wasn't trying to neglect MEF or hide things from you

DP

10:09

Daniel Pipes

I forgive you this. But get to work and show me that MEF and its mission are as important as you say they are. Remember, I've only worked directly with you for five weeks now. I am still getting to know you and what you can do. Show me.

LB

10:10

Lisa Barbounis

Thank you. I will.

11 December 2018

DP

09:00

Daniel Pipes

<https://twitter.com/DanielPipes/status/1072490863887044610>

17 December 2018

LB

14:07

Lisa Barbounis

<https://www.politico.eu/article/britain-nationalist-dark-web-populism-tommy-robinson/>

20 December 2018

DP

07:31

Daniel Pipes

please remember to add an introduction to the first Bensman piece, explaining that he's a new fellow

LB

07:38

Lisa Barbounis

Will do

28 December 2018

DP

07:33

Daniel Pipes

In general, I'd appreciate your being in the office when I am.

LB

07:33

Lisa Barbounis

I understand my son is sick and my husband is away.

31 December 2018

DP

15:46

Daniel Pipes

The Bensman piece is misdated. It did not come out today in the Federalist

LB

17:45

Lisa Barbounis

I will correct it. I put it as today's date so that it would show on featured articles.

3 January 2019

LB

18:04

Lisa Barbounis

Dr. Pipes.

Arthur Stein called me today in response to your message.

Did you want to speak tomorrow about what he said? I feel like it would be better explained over the phone rather than email.

Does that work for you?

DP

18:05

Daniel Pipes

do it now, while it's fresh

LB

18:05

Lisa Barbounis

Ok. I'll call you now.

7 January 2019

DP

12:13

Daniel Pipes

tough one to decide: I am inclined to skip. Good but removed from our topics, no mention of Middle East or Islamism. <https://cis.org/Bensman/Notes-Trump-Administrations-Claim-3000Plus-Terrorist-Apprehensions-US-Borders>

LB

12:15

Lisa Barbounis

I'm a skip.

DP

12:32

Daniel Pipes

Ok

10 January 2019

DP

12:08

Daniel Pipes

wondering why you sent out only the summary of the McDonald MEQ piece. We normally send out the whole text.

LB

12:13

Lisa Barbounis

We did both. Grayson said you approved full mail out to those who donate anything and a partial mail out to those who have not donated at all to drive traffic MEFO. Matt got a list of all donors that gave anything since 2017 and separated them out. Grayson said we would normally do an excerpt of the article but the beginning of the article was dull so he did a summary. I didn't realize he was sending the summary without your approval.

We have been working a lot together this week to get the website and MailChimp templates and social media all to a baseline so we can track engagement and get more viewers.

DP

12:14

Daniel Pipes

I am unaware of all these decisions. I believe our primary goal is to get read, not to get traffice, and so we should always send out the complete texts, unless there is some special reason not to (like the WSJ does not allow that for a month).

LB

12:16

Lisa Barbounis

I was under the impression that you approved that decision.

12:17

I specifically asked.

12:18

We did it for two mail outs and web traffic has been higher in the last two days than the last two months.

DP

12:20

Daniel Pipes

Let's avoid a big discussion of this issue. Just please go back to sending full texts always to everyone, unless there's a special reason not to.

LB

12:21

Lisa Barbounis

Ok

DP

12:31

Daniel Pipes

Thanks. How are your social media efforts going?

LB

12:43

Lisa Barbounis

Great actually. I opened an Instagram account yesterday and we have already had clicks there. I tweeted articles from my personal account and got 50 clicks on the one article from my one tweet and several retweets. As both Twitters grow that will help. I'm trying to follow the news trends and insert our relevant articles into the conversations. My DC friends have big twitter followings and will also retweet my posts.

I'm still waiting on YouTube to get back to me for access. I don't want to start a brand new channel. A lot of fellows sent me media clips so we have a lot to load and promote. Which is great.

Grayson asked to tackle Facebook for just the next few days to optimize some things.

And I have been calling editors and think I should have a meeting with the Wall Street Journal next week. They sounded very interested.

DP

13:25

Daniel Pipes

good to hear things are moving. Let's talk before you meet editors to go over what you will say.

LB

13:38

Lisa Barbounis

Will do.

13 January 2019

DP

23:17

Daniel Pipes

our guy Tarek: <https://twitter.com/Imamofpeace/status/1084295739511984128>

14 January 2019

LB

11:17

Lisa Barbounis

I got a meeting with the editor at Reuters next Thursday in their building

DP

11:26

Daniel Pipes
excellent

DP

11:54

Daniel Pipes
call me now for some connections I have to your editor list?

DP

22:36

Daniel Pipes
Looks like I will be addressing a conference in Brussels on Feb. 1

LB

22:37

Lisa Barbounis
I will still be there

DP

22:42

Daniel Pipes
I saw

LB

22:43

Lisa Barbounis
Is it a conference I could attend? To watch you speak?

DP

22:45

Daniel Pipes
Yes, to both, will send you something

DP

23:01

Daniel Pipes
It will be more like a seminar, of conservative parties dealing with the issue of immigration and Islamization. I'd have to ask to get you in. Will send you more information on it when I have a formal announcement

LB

23:05

Lisa Barbounis
Thank you. Since you will be there are you interested in attending Janice's conference?

DP

23:11

Daniel Pipes

When is it?

LB

23:11

Lisa Barbounis

The 30th

23:12

And a screening of Lauren Southerland's borderless on the 31st. But I think you would be less interested in that.

DP

23:12

Daniel Pipes

there is also a UN conference on the 31st

LB

23:13

Lisa Barbounis

Yes. I was going to try to go.

DP

23:13

Daniel Pipes

2019-01-31 invi-UNICRI.pdf

Not included, change data exporting settings to download.

507.4 KB

LB

23:13

Lisa Barbounis

We are all staying here: <https://www.steigenberger.com/en/hotels/all-hotels/belgium/brussels/steigenberger-wiltchers>

DP

23:26

Daniel Pipes

thanks

15 January 2019

DP

09:38

Daniel Pipes

2019-02-01 BSF draft agenda.pdf

Not included, change data exporting settings to download.

82.2 KB

09:38

not sure yet if going to this
17 January 2019

DP

09:50

Daniel Pipes

Daily Wire is a publication worth looking at for MEF authors. I've known Ben Shapiro since he was a teenager.

LB

09:50

Lisa Barbounis

He's my favorite.

LB

12:36

Lisa Barbounis

Grayson said you approved the partial mail out for non donors. I wanted to check with you before I sent anything out.

DP

12:50

Daniel Pipes

yes, I reluctantly did because Matt had okayed this some time ago.

LB

15:41

Lisa Barbounis

When you get a moment will you take a look at the article emails I sent you from today and yesterday?

DP

16:51

Daniel Pipes

I thought I returned both

LB

17:12

Lisa Barbounis

Apparently I'm not receiving emails. I contacted our email support

DP

17:12

Daniel Pipes

Spam?

LB
17:13

Lisa Barbounis

Nothing

17:16

Just got them all back.

17:16

Some weird rule was applied.

DP

18:11

Daniel Pipes

you found them?

LB

18:11

Lisa Barbounis

Yes. They wound up in a fundraising folder. I have no idea how. Its fixed. All is right with the world.

DP

18:12

Daniel Pipes

fast internet and accurate computer are important for the good life

LB

18:12

Lisa Barbounis

True story.

LB

19:44

Lisa Barbounis

Dr. Pipes. I need your advice. Tommy just called me and said Janice deplatformed him from the Brussels free speech and that Alex Jones was speaking. She told tommy she was afraid of protesters. I asked Janice to confirm and she said she wasn't confirming speakers at this time. I don't want to be associated with Alex Jones. She paid for my hotel. I paid for my flights and planned a few days extra after. I want to pull out but I planned the trip. I'm thinking of pulling out but maybe just attending. Thoughts?

DP

19:47

Daniel Pipes

Damn, damn. Yes, it would not be good for MEF to be associated with Jones, who is dispicable, though attending is fine. What a dirty trick she pulled on you.

LB

19:50

Lisa Barbounis

I'm disheartened. I'll attend. Work from there network. Are you planning to speak at the other conference?

DP

19:51

Daniel Pipes

I am inclined not to. I am tempted but there's so much work and I just got home after 20 days on the road.

19:51

I can still try to get you into it

19:51

Have to decide in the next couple of days

LB

19:52

Lisa Barbounis

That would be great. I can still attend the UN conference, too

18 January 2019

DP

09:23

Daniel Pipes

You omitted the original title of Win's piece. Please add it to the website version.

LB

09:30

Lisa Barbounis

Ok. Doing it now

DP

09:31

Daniel Pipes

Please be careful. I don't want to be looking over your shoulder

LB

09:35

Lisa Barbounis

Understood.

19 January 2019

DP

13:58

Daniel Pipes

This caption at the Fatah piece: "Canada Grants Asylum To Saudi 18-Year-Old Women Who Feared Severe Retaliation After Fleeing From Her Family"

1. You don't ID which is Rahaf, nor who the other two are.

2. Captions should not be in caps.

21 January 2019

LB

12:14

Lisa Barbounis

I corrected it. I took it from the caption under the original source. I'm learning so much.

Secondly, Can we change the Bensman prayer rug title it's a little boring?

Finally, may I attend the Qatar conference?

12:16

Prayer Rugs on the US Southern Border

Trump and Prayer-Rug Derangement Syndrome

Trump, Migration and Prayer Rugs on the Border

Prayer Rugs as Evidence of Islamic Migration over the US Southern Border

12:24

I was also thinking of writing an article about the Brussels conferences.

DP

12:48

Daniel Pipes

Good idea about Brussels. Will know later today if going or not

22 January 2019

DP

09:54

Daniel Pipes

Not going. Will ask if you can attend the Feb. 1 event.

09:58

wrote him, hinted at a trade, he includes you in his event, you get him to the one you are attending.

He'll write you directly if interested

LB

09:59

Lisa Barbounis

That's great.

DP

10:02

Daniel Pipes

He wrote me, invited you

LB

10:07

Lisa Barbounis

I received it. Thank you. I will send the request to Janice. What is the name of his conference and who is he affiliated with? I did a quick google search and his website is not related to our work

DP

10:15

Daniel Pipes

I'll send you information

10:16

2019-02-01 BSF draft agenda.pdf

Not included, change data exporting settings to download.

82.2 KB

LB

10:16

Lisa Barbounis

Thank you.

10:17

Is he an organizer?

DP

10:18

Daniel Pipes

the organizer

DP

14:24

Daniel Pipes

catch me up when you are free? In my office

LB

14:25

Lisa Barbounis

I'll be right in

23 January 2019

LB

10:10

Lisa Barbounis

Did you see the letter from the BBC that was sent to your email?

DP

10:10

Daniel Pipes

yes, and wrote back, asking for confirmation that it's legit

LB

10:10

Lisa Barbounis

Tommy got the same one 2 days ago

10:10

He is declining to be interviewed

DP

10:10

Daniel Pipes

it is legit, then?

LB

10:11

Lisa Barbounis

Yes. He sent it to me as soon as he got it. He thinks that is why Janice deplatformed him

DP

10:11

Daniel Pipes

I'll look at it

10:12

big-time show. Why would she bounce him because of this? UK is a tad confusing

10:13

I'll go on the show if the producers convince me they will be fair to Tommy Robinson - and me

LB

10:15

Lisa Barbounis

I hear that his old staff Caolen Robertson has secret recordings of him and has been working with the BBC. Caolen works with Lauren Southerland and they will be at the Brussels event, that's the Janice connection. When Tommy was in prison Caolen ciphered money to himself from Tommy's donations so tommy fired him. Sour grapes.

DP

10:16

Daniel Pipes

so, Caolen got TR bounced from the Janice event?

LB

10:18

Lisa Barbounis

That's what tommy thinks but I don't know. They said it was politics in the building. It doesn't make sense to me.

10:18

Alex Jones isn't speaking now. They asked me to rejoin the speaker list. But I want to confirm the other speakers before I agree

DP

10:19

Daniel Pipes

good, and yes, be cautious

LB

10:21

Lisa Barbounis

When will you be in the office again? So I can adjust your Facebook. I leave late Monday night

DP

10:22

Daniel Pipes

Friday

10:32

my draft note to BBC, comments welcome:

Dear Mr Sweeney:

I'd be pleased to appear on camera on Panorama - with just one condition: that you convince me that the show will be fair to Tommy Robinson (and also, by implication, to myself).

Tommy is unconscionably assaulted by the UK media, including the BBC, so I start out suspicious, and the more so because the grapevine informs me that Tommy's former staffer Caolen Robertson has secret recordings that he has made available to you.

If we can work this out, I will be in Philadelphia through the end of January.

Yours sincerely,

Daniel Pipes

LB

10:40

Lisa Barbounis

This is Tommy's reply: Dear Mr Sweeney,

Thank you for your letter.

I am concerned that the programme and film you mention will contain false allegations about me. Several disgruntled ex-employees have been shopping false allegations about me to various British media. These former associates have a personal or political grudge against me, and are using their former connection to me for collateral interests. I am concerned that they may have provided false and defamatory allegations to the BBC that you might treat as fact. You should be aware of their malice, and treat their information with skepticism.

It is important that I be given a reasonable opportunity to review these allegations before the

broadcasts, and that I have a chance to consider them, and if necessary, to marshal contrary information or documents. That cannot reasonably be done in a live “gotcha” environment. Your letter outlining the scope of your programme is so general and vague that I cannot possibly proceed without knowing more particulars. You are essentially asking about my entire life going back a decade but have given me no specifics.

I know that Panorama prides itself in finding the truth, as opposed to merely publishing a tabloid-style spectacle. I would ask that you put to me any stinging allegations in some detail, so that I can reply comprehensively to them. This will ensure that your viewers have all of the facts from which to draw their conclusions — not just those selected by my political opponents. You have asked me to reply to you by 28 January; I am replying now so as to provide as much time as possible for you to put allegations to me, and for me to furnish a reply, and for any follow-up exchanges. I am ready to start this process immediately, and I would encourage you to send me any documents by e-mail, to tommy2711robinson@icloud.com

This due diligence is important to ensure that you live up to your high journalistic standards, and just as important, to ensure that you do not defame me, or permit other malicious individuals to use your programme to do the same.

If the process over the next week is meaningful and comprehensive, I would consider appearing on the programme itself. Your willingness to give me a fair and reasonable opportunity to know the case against me will be an indication of how fairly the actual program will be.

I look forward to working with you.

Yours truly,

Stephen Lennon

10:46

I will send your draft back in one minute

10:57

Dear Mr Sweeney:

I'd be pleased to appear on camera on Panorama - with just one condition: that you convince me that the show will be fair to Tommy Robinson (and also, by implication, to myself).

Tommy is unconscionably assaulted by the UK media, including the BBC, so I start out suspicious, and the more so because the grapevine informs me that Tommy's disgruntled former staffer has been contacting the media with the intention to damage his reputation.

If we can work this out, I will be in Philadelphia through the end of January.

Yours sincerely,

Daniel Pipes

24 January 2019

DP

08:00

Daniel Pipes

Yawn:

08:00

<https://www.timesofisrael.com/why-are-us-pro-israel-groups-boosting-a-far-right-anti-muslim-uk-extremist/>

LB

08:07

Lisa Barbounis

All old and fake news. At least all your quotes are good ones. They couldn't even get why he was arrested correct. Will they ever stop trying to do hit jobs?

DP

08:07

Daniel Pipes

Will you reply to this?

08:08

Though less important in the UK, this article has more importance to our readers and donors

08:08

by the way, I don't recall anywhere we calling ourselves pro-Israel

LB

08:11

Lisa Barbounis

Sure. There is so much wrong with the whole piece.

DP

08:12

Daniel Pipes

Ask the editor for a right to reply.

LB

08:12

Lisa Barbounis

Will do.

LB

12:53

Lisa Barbounis

I just wanted to double check with you. No one from the Times of Israel contacted your for comment, correct? All of the quotes in this article are old. Yes?

DP

12:56

Daniel Pipes

Not sure. I think the author called me. I'll check in a bit.

LB39

Lisa Barbounis

I'm writing the response but I think it might be good as an LTE with a broader general point. I'll send you both versions. BBC got back to Tommy. Did they get back to you? Here is their response:

British Broadcasting Corporation
W1 NBH 04D,
BBC Broadcasting House,
Portland Place,
London
W1A 1AA

BY EMAIL

24 January 2019

Dear Mr Lennon

Thank you for your email of 22 January.

In keeping both with the Ofcom guidelines and our own at the BBC, we outlined the areas in our initial letter that we plan to discuss within the film – and with you on camera.

As I am sure you are aware, it is not standard practice to give exact detail on specific questions in advance of any interview and we are under no obligation to do so. In addition, the areas outlined in our original letter are ones on which you have discussed extensively – and have been questioned on in the past.

We are, however, committed to engaging in a meaningful dialogue, and can confirm again that the following are the areas that we hope to discuss during the interview:

1. Your involvement in and leadership of the English Defence League and, that during this time and afterwards, you have been labeled as a far right extremist and, by some, a racist.
2. The way in which you have responded to certain articles and comments made about you, as well as the response from your supporters following these incidents.
3. The language you have used when discussing Islam, Muslims, terrorism and child sexual exploitation.
4. Discussion there has been as to the potential impact of your statements in encouraging the actions of others.
5. The incidents where you have been charged with contempt of court; the impact this could have had on active legal proceedings, and the effect these activities have had on survivors of CSE.
6. Your appointment as an adviser to UKIP and the debate there has been about your suitability for this role as a result of your public statements on a range of issues as well as the convictions you have received for a range of offences.
7. The background and publicly stated views of individuals and groups you have worked and associated with both here and abroad.
8. The level and type of support you have received – including on social media platforms; at public events and in terms of donations, and the incidents that have generated an increase in this support.
9. Debate about the ways in which the activities of those on the far right are as a result of, or encouraged by, Islamist extremists and vice versa.

The interview will be an opportunity for you to discuss these subject areas with us, including both the support and criticism you have received in relation to them. The interview will be pre-recorded, and your response will be fairly and accurately reflected within the film.

We look forward to hearing from you.

Yours sincerely
John Sweeney
BBC Panorama john.sweeney@bbc.co.uk

<http://www.bbc.co.uk>

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Further communication will signify your consent to this.

DP

13:44
Daniel Pipes
I've not heard back. LTE?

LB

13:47
Lisa Barbounis
Letter to the editor

DP

13:52
Daniel Pipes
At least the BBC is being honest with him, that it's going after him. Not, for example, asking him his views on the future of the UK or about his many ethnically diverse friendships

13:53
As it will presumably go ahead with this program anyway, it might be worth his while to appear on it. Tough call.

LB

13:54
Lisa Barbounis
I told him I thought he should do it and I believe now plans to

DP

13:54

Daniel Pipes

So, I agree too

LB

13:55

Lisa Barbounis

Yes.

DP

14:13

Daniel Pipes

Please send this out today - important today - to all but my list:

<http://www.danielpipes.org/18683/mef-at-25-failure-success>

LB

14:14

Lisa Barbounis

Its already up on the site was going to send at 3 but I can send now.

DP

14:14

Daniel Pipes

I just made some changes, like the logo at the bottom

LB

16:41

Lisa Barbounis

I think the conference call went well did you listen?

16:42

I will have the Tommy piece ready for you soon. I'm almost done.

DP

16:44

Daniel Pipes

I did not.

Great

DP

17:47

Daniel Pipes

This author called me today, wants to do a podcast about Tommy Robinson when I am in Boston in a couple of months:

17:47

<https://spectator.us/tommy-robinson-america/>

17:47

He grew up in the next town over from Luton

LB

17:48

Lisa Barbounis

That's great!!

DP

17:48

Daniel Pipes

which reminds me, where do we stand on TR's visa to the US?

LB

17:49

Lisa Barbounis

My contacts have been unhelpful. Cruz's guy called tommy yesterday and said they were discussing it next week. I can jump back into it full steam. It would be great to get him here.

DP

17:51

Daniel Pipes

we need a patron in the USG; too bad Steve King is so discredited. Gosar?

you should include these developments in the weekly report

LB

17:53

Lisa Barbounis

Gosar was willing but didn't have enough recognition with the embassy. We need someone on foreign affairs or a bigger name I think.

17:53

Or someone in the administration. I reached out to Gorka and he said he would pass it along. Nothing materialized.

DP

17:54

Daniel Pipes

Green wrote me: do call if the MEF does anything else in then UK or brings people over here. For what my opinion's worth, it would be good to try again to bring TR here, just to see what would happen with his visa application.

17:54

Perhaps discuss a patron with EJ and Cliff

17:55

we don't want this to fizzle. That would be us losing

LB

17:55

Lisa Barbounis
I will speak to them both

DP

18:13
Daniel Pipes
But the ToI response is the urgent matter.

LB

18:14
Lisa Barbounis
I'm almost there.
25 January 2019

LB

09:19
Lisa Barbounis
Should the wall street journal article go out with full text or partial text and a link to the article?

DP

09:22
Daniel Pipes
partial, as I did at DPO. That's the deal with them. I post the full text only after a month.

DP

23:01
Daniel Pipes
I posted the paper version at DPO, so it can be read there.

Nice mention by Josh Hammer: <https://www.dailywire.com/news/42655/lol-palestinians-renounce-all-us-aid-they-forgot-josh-hammer>

LB

23:03
Lisa Barbounis
He's a good guy. Loves MEF
26 January 2019

DP

10:12
Daniel Pipes
Did the BBC find my reply?

LB

10:22
Lisa Barbounis

It was an assistant. I told her that you sent the reply and that you hadn't received a response. She said she would let them know. I gave her my email and told her if they don't find it let me know and I'll make sure you resend it right away.

DP

10:23

Daniel Pipes

thanks.

27 January 2019

DP

17:22

Daniel Pipes

with all the excitement on Friday, we did not get to Facebook. Let's do that Tuesday

LB

17:35

Lisa Barbounis

I leave tomorrow night at 7pm but we can have Delaney or Matt switch the setting on Tuesday

DP

17:47

Daniel Pipes

ah, right, the big trip coming up

28 January 2019

DP

09:06

Daniel Pipes

I'd appreciate a report from you about Matt's actions and statements at the office tomorrow.

LB

09:07

Lisa Barbounis

Ok. I'll send it over today.

DP

09:07

Daniel Pipes

Fine on the telephone, Thanks

LB

10:21

Lisa Barbounis

I just called from the office. Let me know when you are free to speak.

LB

12:27

Lisa Barbounis

Can you please resend the bbc response to Sweeney and copy me? They didn't get it.

Unless you just went with my edits then I can just send it from my email

DP

12:28

Daniel Pipes

Will do

LB

12:32

Lisa Barbounis

Thank you.

DP

14:57

Daniel Pipes



Sohrab Ahmari: I never met him but he's an Iranian-origin writer very much along our views and now at the New York Post. Good person for you to meet

LB

14:58

Lisa Barbounis

I will reach out to him too

DP

18:10

Daniel Pipes

For Tommy Robinson:

18:10

<https://nypost.com/2019/01/26/uk-paper-apologizes-and-pays-damages-to-melania-trump-over-false-report/>

18:11

Look at the triviality of the Daily Telegraph's supposed error - really a matter of opinion

DP

22:57

Daniel Pipes

Wrote to BBC's Sweeney. Please make sure it got to him; and forward it to Tommy Robinson.

29 January 2019

LB

03:43

Lisa Barbounis

A second email to Sweeney?

03:43

I see it.

DP

11:33

Daniel Pipes

Matt just wrote me (about something trivial), first communication in nearly 4 days.

LB

12:28

Lisa Barbounis

Maybe that's a good sign?

12:28

Trying to ease back into communicating? I'm just trying to be optimistic

DP

12:30

Daniel Pipes

we'll see

LB

12:57

Lisa Barbounis

Did you respond to the BBC newest reply?

DP

13:27

Daniel Pipes

I did not. Basically, Sweeney's asking me to trust him. Can you see if he is worthy of such trust?

DP

15:58

Daniel Pipes

1. Had it out at length with Matt. He's back in his old role. I told him I can't take another round of antics like this.

2. Delaney added you as editor to my Facebook page. Did it go through?

LB

16:43

Lisa Barbounis

1. Did he sound better? Was he apologetic?

2. I don't see it on my page yet.

DP

16:48

Daniel Pipes

1. Noted that his entire family thought him nuts for confronting me as he did. Gave reasons as a mixture of Arthur S, having bad feelings about Gregg, and wanting to show me who he is. Finally, did apologize. I said, don't do this again.

2. Now?

LB

16:52

Lisa Barbounis

Got it.

16:52

Thank you.

30 January 2019

LB

14:07

Lisa Barbounis

John Sweeney - "Ghastly not on our side"

14:12

And if you are going to do it, do it only under the condition you have your own audio and video so that they can't take it out of context.

DP

14:42

Daniel Pipes

that quote is from where?

Tommy Robinson said he'd call today to discuss the BBC program but has not. Can you prompt him?

LB

16:35

Lisa Barbounis

I will. James delingpool I spelled that incorrectly.

16:35

I was discreetly asking around.

16:35

Katie concurred. And she had nice things to say about you.

DP

16:53

Daniel Pipes

she did? After our blow-out fight in Palm Beach?

16:54

Talked with Tommy Robinson. He talked at length about the many tactics BBC might be using against him, said I should not go on. I noted that I am a friendly voice for him, so all that does not apply. Does he want me on or not? He said to wait a day or so until he meets with a media lawyer

LB

16:56

Lisa Barbounis

I'll speak with him.

1 February 2019

LB

11:30

Lisa Barbounis

He said he would feel awful if bad stuff came out against him and damaged you by association. It's up to you. He's just trying to be kind.

11:31



11:31

Only me. 😞

DP

11:49

Daniel Pipes

poor you

4 February 2019

DP

15:08

Daniel Pipes

someone to meet:

15:08

https://en.wikipedia.org/wiki/Sohrab_Ahmari

6 February 2019

LB

11:34

Lisa Barbounis

I know that you are busy today. But I wanted to talk to you about Grayson's upcoming visit. We want to get video of the project directors and some fellows that are close. Are we able to reimburse for transportation for the day to Philadelphia for filming?

11:35

The conference looks great on the web.

DP

11:35

Daniel Pipes

Later

DP

17:59

Daniel Pipes

Please don't send a private message to Gregg to the entire staff.

Who do you have in mind coming to Philadelphia?

LB

18:00

Lisa Barbounis

Sorry about that. The project directors to start. Then Oren, Sam M, maybe Micah

18:00

Each to do little videos about their work.

18:01

How was the conference? Was it a success? It looked very professional.

DP

18:01

Daniel Pipes

seems a bit extravagant to fly people all over for a little video .

Conference went well. Started slow, picked up speed

LB

18:01

Lisa Barbounis
Not fly. Just train.
18:02
Like cliff Sam EJ
18:02
Anyone close-ish.

DP

18:02
Daniel Pipes
in this electronic age, do we really need to move people around for videos?

LB

18:03
Lisa Barbounis
They way Grayson will be filming it would be easier.
18:03
The*
18:08
For the most part either they have to come to the camera, or the camera has to come to them.
18:09
To make it quality we need to make use of the camera, lights, greenscreen etc. Skype won't achieve the results we are aiming for.

DP

18:19
Daniel Pipes
he would use the set-up at our office?

LB

18:27
Lisa Barbounis
Yes. That's the plan.

LB

20:12
Lisa Barbounis
<https://mobile.wnd.com/2019/02/al-jazeera-at-anti-qatar-conference-in-washington/amp/>

Nice write up.
7 February 2019

LB

13:52
Lisa Barbounis
Can I tweet out the code pink interruption from our twitter account?

13p52

Daniel Pipes

Yes

DP

15:12

Daniel Pipes

Did you do so?

15:12

2. did Tommy Robinson tell you about the bit of mischief he is planning?

LB

15:13

Lisa Barbounis

I did tweet it out.

15:13

Yes I have been speaking with him. He told me he was going to speak with you today

15:14

He sent me the undercover videos he has. Pretty damaging

DP

15:15

Daniel Pipes

1. You did not mention me, more useful to me if you do.

2. Looks explosive

LB

15:16

Lisa Barbounis

He let me know late last night that he was planning to speak to you.

I think he is going to take down the BBC

DP

15:26

Daniel Pipes

looks like it.

15:37

I did my own: <https://twitter.com/DanielPipes/status/1093608749514874880>

LB

15:38

Lisa Barbounis

I will retweet that, too.

9 February 2019

DP:40

Daniel Pipes

<https://www.politicalite.com/breaking-news/breaking-tommy-robinson-to-expose-the-bbcs-fake-news-against-him/>

LB

07:54

Lisa Barbounis

I sent you a video to WhatsApp

DP

08:01

Daniel Pipes

Thanks, Tommy sent me that as well – that's why I look to see for any coverage in the news

08:01

I do not think that yelling and making accusations is the best way of going about it – but we will see

LB

08:02

Lisa Barbounis

I sent the story to a NYT reporter that I have a meeting with. He's thinking of running it. And we sent it to Tucker and Hannity.

08:02

He showed them the footage calmly first before he yelled at them.

DP

08:03

Daniel Pipes

Please stick to Telegram. In case of discovery I do not want to have to turn over Anything but this

LB

08:03

Lisa Barbounis

Will do.

DP

11:03

Daniel Pipes

If we have moved to Grayson's website, does Gregg need still to be on the exchanges about articles to MO, SMO, etc.?

LB

11:08

Lisa Barbounis

No. I just didn't want to stir the pot.

12:44

Daniel Pipes

But you don't need him anymore to send the articles, right?

LB

13:29

Lisa Barbounis

Not one bit.

DP

14:05

Daniel Pipes

So, I'll suggest it

LB

14:07

Lisa Barbounis

I could just not copy him on there and then no harm no foul.

DP

14:08

Daniel Pipes

easiest, yes

LB

17:30

Lisa Barbounis

Tommy was asking for Bannon's number and for some reason I can't find it in my contacts. Do you happen to have it?

DP

18:07

Daniel Pipes

[+1 \(310\) 990-6526](tel:+13109906526)

LB

18:07

Lisa Barbounis

Thank you.

10 February 2019

DP

23:30

Daniel Pipes

Did I hear back from you about Tommy Robinson for Imam Tawhidi?

11 February 2019

LB

08:28

Lisa Barbounis

I sent you a draft and you sent it back edited. You said you wanted to send it to Tawhidi.

DP

08:28

Daniel Pipes

I was waiting to get it back from you

LB

08:31

Lisa Barbounis

Oh. There were no instructions. I thought you were just showing me what you sent him. It looked great to me.

LB

12:35

Lisa Barbounis

Would you like to come to Manchester for the BBC event and speak?

12:35

It will get lots of publicity. You could speak about how the MSM has an agenda for Islam?

LB

13:03

Lisa Barbounis



12 February 2019

LB

17:23

Lisa Barbounis

Grayson wants to know what you think about me doing a 5 min video on Rep. Omar to take advantage of the news cycle

DP

17:28

Daniel Pipes

Do you have something original to say on the subject?

LB

17:30

Lisa Barbounis

The controversy is being played out on Twitter. The new element is the video. I can also look for a new angle. But the idea is to lay out the controversy for the lay man and go after her.

DP

17:32

Daniel Pipes

OK, go ahead

LB

17:33

Lisa Barbounis

Would you mind if I quoted your Twitter on the subject?

DP

17:34

Daniel Pipes

Of course not. It is public and meant to be quoted

LB

17:35

Lisa Barbounis

Sounds good. Thanks.

DP

19:18

Daniel Pipes

[https://www.mirror.co.uk/news/uk-news/sir-tommy-robinson-banner-unfurled-13972878?
utm_source=facebook.com&utm_medium=social&utm_campaign=mirror_main](https://www.mirror.co.uk/news/uk-news/sir-tommy-robinson-banner-unfurled-13972878?utm_source=facebook.com&utm_medium=social&utm_campaign=mirror_main)

LB

19:23

Lisa Barbounis

Funny how they won't report the real story about the bbc. Twitter and Facebook are going crazy with the teasers.

13 February 2019

LB

05:20

Lisa Barbounis

<https://www.thesun.co.uk/news/8410133/tommy-robinson-drugs-racist-slur-rant/>

Tommy just called me because the sun just leaked video of him that was taken from a private group chat of him trying to be funny with his friends. It's not funny. It's bad.

This is going to be all over the news over there. In a matter of hours.

05:32

His base won't care but it hurts his credibility. The only thing that could be saved is that the BBC or MSM are scared and putting out tit for tat videos.

05:35

Even sadder, the group chat it came from has 3 Muslims in the chat. It's supposed to be them being funny with each other.

LB

05:53

Lisa Barbounis

<https://www.facebook.com/thetommyrobinson/videos/424328728108417?sfns=mo>

DP

06:33

Daniel Pipes

He's a rascal, gets constantly into trouble.

DP

06:53

Daniel Pipes

could you update the MEFO homepage Spotlight on Qatar to include the videos, etc. from the conference?

06:55

And I cannot find the page with the videos from the conference - it should be prominently displayed on the HP.

This is the sort of tending, updating, focusing that I am looking to you to do. I do this for DPO and MEFO needs it too.

06:56

Also, the Spotlight is out of date, telling how to see the conference live-streamed.

06:57

I eventually found this page by looking it up in search, meaning I had to know it's there to find it - and yet it's our showpiece page these days. Not good.

06:57

<https://www.meforum.org/57747/qatar-us-ally-or-global-menace>

LB

07:52

Lisa Barbounis

I will make sure it is up there now.

14 February 2019

LB

18:55

Lisa Barbounis

SW

Samuel Westrop 14.02.2019 18:54:35

It's a blog post, but quite an important one. I know we don't usually mail out blog posts, but it makes MEF look quite good... what do you think? <https://www.meforum.org/islamist-watch/57800/islamic-relief-strikes-back-but-misses>

DP

19:19

Daniel Pipes

Sure.

LB

19:19

Lisa Barbounis

Thank you

15 February 2019

DP

09:29

Daniel Pipes

I think you are dragging us into the Brexit issue and generally becoming too close to Tommy Robinson

09:29

<https://twitter.com/MikeStuchbery/status/1096166169940234243>

09:29

We have to stay out of unrelated topics and keep our distance

LB

09:31

Lisa Barbounis

Will do. I did say on that feed that we had nothing to do with that.

09:34

Did you get my email about the articles from yesterday?

And! We have one of the videos almost completely edited. I should have it in an hour or two to send to you. I think these will be great!

DP

09:43

Daniel Pipes

1. Yes, but denial is not what we need.

2. Yes, but focused on writing at the moment.

3. Good

09:52

1. Being defensive is not healthy for us

LB

09:54

Lisa Barbounis

Understood.

DP

09:54

Daniel Pipes

In this business, there really is no personal capacity. If you raise orchids, sure. But not topics related to MEF's

LB

09:55

Lisa Barbounis

Agreed. I'll be more careful. And I appreciate the feedback.

09:55

I take it seriously.

10:02

Another positive my friend on the hill is getting me Pence's scheduler's email for the speaking invite.

DP

10:03

Daniel Pipes

well done

DP

10:22

Daniel Pipes

let's SMO this

10:22

<http://www.israelnationalnews.com/Articles/Article.aspx/23456>

10:22

But title misses the point

LB

10:23

Lisa Barbounis

I can change the title on MEFO or leave it and commentary on SM will hit the target.

DP

10:43

Daniel Pipes

it's the challenge to Omar that's central
19 February 2019

LB

11:28

Lisa Barbounis

Dr. Pipes. I just spoke with Raheem. He is speaking at CPAC and has a booth he isn't using. In a prime location. Would you want MEF to attend and man the booth? The booth is usually 4K but we can get it from Raheem for 3k

11:29

I think it would be good for MEF.

DP

11:33

Daniel Pipes

Interesting. But I am wary of identifying MEF too explicitly as conservative. That said, how would we use it?

LB

11:36

Lisa Barbounis

We could have a screen with our videos. Maybe have EJ there to promote IVP. We still have IR reports we could handout. I don't think it would position us as too conservative because only the people at the conference will know we are there and it's great for getting new supporters/donors who may not be familiar with our work.

11:36

We have all the banners and supplies.

DP

11:43

Daniel Pipes

One never knows, the other side trolls there. I'll be in shortly to discuss further, if you're in the office.

LB

11:43

Lisa Barbounis

I am here

DP

13:57

Daniel Pipes

Facebook not going through

LB

15:35

Lisa Barbounis

I'll check it after the conference call

DP

15:40

Daniel Pipes
have to leave shortly

DP

20:20

Daniel Pipes
The Twitter-Facebook connection does not work. I found this explanation:

20:20

<https://help.twitter.com/en/managing-your-account/link-twitter-to-facebook>

20:21

Important: A recent update to the Facebook Platform Policies ended the ability to automatically post Tweets to your Facebook profile or page.

LB

20:21

Lisa Barbounis
I'll just repost them for you. It's not hard.

DP

20:21

Daniel Pipes
That's why my last post is Aug. 1. So, it has to be done manually.
20 February 2019

DP

10:52

Daniel Pipes
Ed told you about his idea of a US bus trip?

10:52

For Britain's Ed

LB

10:53

Lisa Barbounis
No Katie Hopkins asked me to do a bus trip for 2020 and said she was going to write up a two pager but I never heard anything from ED about a bus thing.

DP

10:55

Daniel Pipes
Hello Daniel

I hope you are well. I recently spoke to Katie Hopkins, and we have tossed around the idea of a 'bus

tour' of America, with speeches in cities across America. Possibly 20 speeches in 20 cities, which could be timely for 2020.

A number of free speech advocates could be involved, and I think the idea would attract a lot of attention and publicity. Katie may have mentioned it to Lisa, but would this be something the MEF might want to sit at the top of? It needs an overarching group I feel – if the idea is something worth exploring please let me know and perhaps Katie and I could talk to you further?

Thanks, Ed

LB

10:56

Lisa Barbounis



10:56

It's the same one.

10:58

I said that I like the idea but for MEF to be interested would need and component of the work we do. Katie Hopkins said that would absolutely be part of it

DP

11:06

Daniel Pipes

it's certainly original.

LB

11:07

Lisa Barbounis

She said she will send me the pager today or tomorrow. It's her idea though.

DP

12:59

Daniel Pipes

Meltwater has started? I am not receiving anything

LB
13:00

Lisa Barbounis

It has. What were you receiving from Cision? I have to set that up for you. I didn't know you got anything. Alerts for you? Do you want fellows, too?

DP

13:07

Daniel Pipes

I receive the daily Cision mess of a report on MEF, projects, staff, fellows. I find it close to useless. It missed my WSJ article last month, for instance.

LB

13:08

Lisa Barbounis

I will set up new alerts for you.

LB

16:09

Lisa Barbounis

I see that you were in the chat group for the Israel media hit. Are you alright with Grayson taking it?

DP

16:11

Daniel Pipes

I don't have an opinion. If he knows what he's talking about, that's fine

DP

19:11

Daniel Pipes

got a confirmation from Meltwater but it wants a password, which I don't have. Also, I'd like e-mails to go to Daniel.Pipes@gmail.com, not Pipes@MEForum.org, which I limit to administrative matters

LB

19:13

Lisa Barbounis

Will do.

21 February 2019

LB

17:54

Lisa Barbounis

<https://www.dropbox.com/home/Test%20Video?preview=MEF+0221+LISA+EURO+MIGRANTS+v1.mp4>

18:08

I think this link is better. <https://www.dropbox.com/s/z1v7suu5a91q8lm/MEF%200221%20LISA%20EURO%20MIGRANTS%20v1.mp4?dl=0>

18:08

What do you think?

DP

19:03

Daniel Pipes

Not sure what you are asking about

LB

19:03

Lisa Barbounis

It's my video. Do you approve it for release?

DP

19:04

Daniel Pipes

just look at the second?

LB

19:05

Lisa Barbounis

Yes. There in one more version where there is was a jump in the footage but they fixed that. Just content going forward

DP

19:10

Daniel Pipes

the 2nd one goes to 404

LB

19:12

Lisa Barbounis

She might have deleted the last link because of edits.

<https://www.dropbox.com/s/ch6tc75yc8kl7y5/MEF%200221%20LISA%20EURO%20MIGRANTS%20v2.mp4?dl=0>

DP

19:23

Daniel Pipes

replied via e-mail

LB

19:32

Lisa Barbounis

I replied via email and forgot to thank you for the kind words.

19:33

I have a large group that could share it for me. Imam T, Katie, tommy, Janice, Amy Mek, etc.

19:33

And it's relevant in the news cycle.

19:37

Josh hammer and Raheem, too. Plus a few more.

DP

19:47

Daniel Pipes

go for it

LB

19:48

Lisa Barbounis

Thank you! We will improve as we go.

LB

21:40

Lisa Barbounis

Can you help with a title?

"Alarming Rise of anti-Semitism in the West"

"Anti-Semitism one of the West's Worst Diseases"

21:40

"Rise of anti-Semitism from the far-right?"

Or "Rise of anti-Semitism in the West."

DP

21:48

Daniel Pipes

far-right misses your point

It's not West, just Europe, right?

Antisemitism: An Ancient Demon Reemerges in Europe

LB

21:48

Lisa Barbounis

Perfect! Thank you!

24 February 2019

DP

10:09

Daniel Pipes

How did it go in Manchester?

LB

11:28

Lisa Barbounis

Well. Good crowd all civil. The press didn't cover it correctly. Called it a protest of an upcoming documentary.

26 February 2019

LB

07:56

Lisa Barbounis

Newest update. They took the documentary off of YouTube and banned Tommy and Danny Tommo from Facebook so no one can see the documentary. Coordinated censorships at its finest.

DP

09:38

Daniel Pipes

Noted.

I just got an MEFO article from Feb. 19. Please make sure you get mailings out the day of or the next day, not a full week later. We look a bit slow and inept this way. Not who we are.

LB

09:39

Lisa Barbounis

Will do.

LB

11:31

Lisa Barbounis

I just heard about matt

DP

11:40

Daniel Pipes

Your thoughts?

LB

11:40

Lisa Barbounis

I would like to sit down with you maybe when you are in on Monday.

11:41

It's hard for me to put into words via text.

DP

11:43

Daniel Pipes

we can talk on the telephone

LB

11:43

Lisa Barbounis

It's a big loss. Tricia can pick up some stuff but she is steadily swamped. there is more going on that we should chat about. Yes. 5-10min?

DP

11:52

Daniel Pipes

yes

12:05

now is good, busy shortly

LB

12:05

Lisa Barbounis

Stepping out of the office now.

12:06

As soon as I'm out of the elevator

DP

17:04

Daniel Pipes

What do you think of my calling a staff meeting, minus Matt, including Marc, on Monday?

LB

17:05

Lisa Barbounis

Sounds like a plan. They would like to hear from you.

27 February 2019

DP

00:39

Daniel Pipes

Of note: Labour Party accuses Tommy Robinson of anti-Islamist hate speech:

<https://www.theguardian.com/uk-news/2019/feb/26/tommy-robinson-banned-from-facebook-and-instagram>

28 February 2019

DP

16:45

Daniel Pipes

I am told that Facebook tells a person which posts got him banned; maybe this is the case for Tommy Robinson too?

LB

16:47

Lisa Barbounis

They did not in this case. They didn't for my little page either. They did put out a statement

LB

17:44

Lisa Barbounis

Dr pipes. For your approval. It's currently unlisted. https://youtu.be/x_mkhvQLb9w

DP

22:21

Daniel Pipes

it's fine.

1 March 2019

DP

10:49

Daniel Pipes

skip this please, not going to send out something that's so contrary to Israel Victory

10:49

<https://www.jpost.com/Opinion/Trumps-plan-is-opportunity-to-change-paradigm-582114>

4 March 2019

LB

06:17

Lisa Barbounis

Spoke to Tommy this morning. He very much wants to sue Facebook. I emailed the Facebook congressional liaison for assistance retrieving the data. They should hand it over because zuckerburg testify before Congress that users own their own data. I'm awaiting a response. If I don't get one soon we could ask a member office to reach out.

Tommy also wants to do a big Censorship demonstration with people who were censored for views on Islam like our deplatforming event just bigger. He is looking for funding.

06:17

And I'll be in on time today despite the snow.

DP

07:18

Daniel Pipes

Right, we can't do anything until he gets his Facebook data and soemone reliable goes through it all - I wonder how much - to verify there is nothing that threatens violence to Muslims. Not a small undertaking, I expect.

Funding street demonstrations was an exception in 2018 due to Tommy Robinson's urgent circumstances. I don't see this as something we'll do agan in the future.

LB

07:24

Lisa Barbounis

You asked about the man helping us with Tommy's visa. His name is Terry Giles and apparently he is very well connected and loaded. I am in regular contact with him. We should try to get him to be a donor. <https://goosesocietyoftexas.com/terry-giles/>

DP

07:26

Daniel Pipes

Too bad - was in Houston two days ago, but I plan to be back. Please ask Caitriona to add him to Salesforce.

LB

07:26

Lisa Barbounis

Will do.

LB

09:12

Lisa Barbounis

Might Shillman be interested in funding tommy again directly?

DP

09:39

Daniel Pipes

I don't know but it's not our first priority with him

DP

11:34

Daniel Pipes

Meltwater?

LB

11:34

Lisa Barbounis

You should be getting morning updates. Are you not receiving them?

DP

11:36

Daniel Pipes

nothing at all

LB

11:37

Lisa Barbounis

ok. give me 10

11:50

We missed a check box. you will get a report 8 and 4 every day. 8 will me media and social media. The 4 will just be media. We split the reports up so that its less confusing. The one from this morning that I am going to forward to you has SM and articles mixed in. We corrected that just now.

DP

12:26

Daniel Pipes

Got the e-mail but it's too much, overwhelming. I'd like no SM and just names of MEF, projects, and staff.

LB

12:27

Lisa Barbounis

Will do.

DP

12:27

Daniel Pipes

preferably no repeats. In the Google alerts, for example, I have MEF -DP, so I only get MEF mentions that do not also mention me.

LB

12:41

Lisa Barbounis

Can you send me contact info for dermer and Baird please?

DP

13:18

Daniel Pipes



13:18



13:21

Ron Dermer.vcf

Not included, change data exporting settings to download.

589 B

LB

13:23

Lisa Barbounis

Thank you

LB

14:20

Lisa Barbounis

I would like to throw my hat in the ring for the office point person.

5 March 2019

DP

11:18

Daniel Pipes

got it. Is Matt in the office?

LB

11:21

Lisa Barbounis

yes

11:22

Dermer is great news. tricia is responding now

DP

11:30

Daniel Pipes

I'd like to balance him with another Middle East ambassador - perhaps UAE or Oman.

LB

11:31

Lisa Barbounis

We are still trying for pence. I'll will get on them with Tricia now.

DP

11:31

Daniel Pipes

good, but the ambassadors are a different level

LB

14:22

Lisa Barbounis

Would you have any issue with Tricia and I sharing an office since we are working on so many things together?

DP

15:21

Daniel Pipes

No, you are welcome to do so.

LB

15:29

Lisa Barbounis

Thank you, we were thinking my office but last week marnie suggested Greggs. Do you care either way? Either will work for us.

DP

15:48

Daniel Pipes

It's fine to take Gregg's - but temporarily, as I do see the new director moving in there before too long. Your decision.

LB

15:49

Lisa Barbounis

We were thinking the director would go there too

DP

15:50

Daniel Pipes

3 of you in one room? Sounds like the Soviet Union

LB

15:50

Lisa Barbounis

Just 2. Tricia and I.

15:51

Tricia and me. Grammar.

DP

15:51

Daniel Pipes

not following - the new director would go there too?

LB

15:51

Lisa Barbounis

No. We would move once he is here

DP

15:52

Daniel Pipes

if you are ready to move out when needed, enjoy it for now

LB

15:52

Lisa Barbounis

I think we will just move once and we will both be in mine.

7 March 2019

LB

06:20

Lisa Barbounis

Tommy will be re-charged today in 3.5 hours for contempt of court and will likely be back in court next week. They are coming at him from every angle.

06:21

He just called me about his legal plans and help from us.

DP

07:57

Daniel Pipes

Damn. Help means money or something else?

LB

07:58

Lisa Barbounis

As an aside, I know that some people said my name for point person. If it is upsetting Marnie she can be the point person for the office. I think we still need one.

07:58

He means legal help.

DP

08:00

Daniel Pipes

Thanks for the offer, but no.

8 March 2019

LB

13:31

Lisa Barbounis

Are you still planning to come into the office. Just so you know it's just matt and I here

DP

13:31

Daniel Pipes

I am. At DMV now

9 March 2019

08:48

Lisa Barbounis

Since it is the same case as before are we able to help tommy through the legal project?

DP

09:05

Daniel Pipes

In theory. But I am under the impression he has plenty of funds for this.

LB

09:06

Lisa Barbounis

He doesn't. PayPal was reduced by 70%. He paid out of pocket for the last demos. He running pretty dry.

09:11

Plus I think he will need the international support again

DP

14:01

Daniel Pipes

Marc will also be calling in at 3:30. Could you handle the calls?

LB

14:07

Lisa Barbounis

Absolutely

13 March 2019

LB

12:16

Lisa Barbounis

<https://www.dropbox.com/home/Test%20Video?preview=MEF+Oren+Islamists+FINAL+V2+.mp4>

12:16

Latest video. Green light?

14 March 2019

LB

08:53

Lisa Barbounis

Can we put out the video?

DP

09:15

Daniel Pipes

I'll get to it soon

19:01

DP

Daniel Pipes
With Gregg back, I suggest sending the daily articles to him again

LB

19:02

Lisa Barbounis

And not you?

DP

19:09

Daniel Pipes
in addition to me

19:09

As before

LB

19:12

Lisa Barbounis

Sounds good

DP

19:37

Daniel Pipes

Please send anything like the video, which takes time to reply to, by e-mail. It gets lost here. Looking now at what you sent

19:42

I am told that /test does not exist

LB

20:11

Lisa Barbounis

I'll get it on YouTube and resend it.

20:11

To your email.

15 March 2019

DP

06:13

Daniel Pipes

do not find it

LB

06:14

Lisa Barbounis

It was still uploading last night to YouTube. I haven't sent you the link just yet. I'll send it over if/when complete.

06:15

Did you want to say anything about the new Zealand shooting from Twitter or stay out of it?

DP

06:46

Daniel Pipes

do you have something original to say? We do not praise or condemn as an institution. We offer useful, important, surprising insights.

16 March 2019

LB

05:09

Lisa Barbounis

Can you kindly remind me of the 5 Ps. I can't seem to find where you have it written

05:10

Never mind. I found it

DP

05:12

Daniel Pipes

6 now

LB

05:13

Lisa Barbounis

Police, politicians, press, priests, professors, and prosecutors

DP

05:13

Daniel Pipes

Bingo

LB

05:14

Lisa Barbounis

Thanks!

17 March 2019

DP

20:51

Daniel Pipes

<https://news.yahoo.com/tommy-robinson-calls-new-zealand-terror-attacker-monster-attacks-media-151508649.html?guccounter=1>

18 March 2019

DP

15:16

Daniel Pipes

Tell me if I am wrong, but I am under the impression that Jack Posobiec is not someone MEF wants to associate with

LB

15:17

Lisa Barbounis

I'm friendly with him. He's pro trump. I don't find his tweets too extreme.

DP

15:39

Daniel Pipes

his reputation won't hurt us?

LB

16:04

Lisa Barbounis

I don't think so. But how are we affiliated with him anyway? Am I missing something?

DP

16:07

Daniel Pipes

RTing him

LB

16:07

Lisa Barbounis

That was an accident that I immediately undid.

16:07

I don't retweet like that from the MEF account. Only fellows and staff

DP

16:08

Daniel Pipes

good. And do remember to add value to the retweet. Be interesting

LB

16:08

Lisa Barbounis

Ok.

DP

16:08

Daniel Pipes

that's our stock in trade

19 March 2019

LB
10:29

Lisa Barbounis

I know you are extremely busy. I want to get the lunch invites out for Tricia. I sent the drafts to you in mailchimp. Can I send them out today?

DP

10:32

Daniel Pipes

the West Coast ones? Yes, I approved them, just asked them to be separate for San Diego, Los Angeles, and Seattle, with \$100 charge for SD &S, \$250 for LA

LB

10:32

Lisa Barbounis

Thank you. Sending now.

DP

10:38

Daniel Pipes

The Spyer WSJ is a MO

LB

10:39

Lisa Barbounis

I don't think we can mail it out Because it is behind a pay wall. I think we can do an expert and a link to the article, correct?

10:40

He also has another different piece in FP that Business insider reposted. I'll send you today's articles soon

DP

10:58

Daniel Pipes

yes, just a portion of it. By the way, aren't we just supposed to send out teasers of everything, pace Grayson?

LB

11:32

Lisa Barbounis

We send full articles to donors and portions with a link to non donor subscribers

11:33

I have Marc's press release loaded once you approve I'll send

DP

11:40

Daniel Pipes

The press release needs to be updated. I sent him the information from today

LB

11:44

Lisa Barbounis

I believe He sent back the updated version 15 min ago

DP

11:47

Daniel Pipes

grrh, I told Tricia the SD & S invitations had an error. \$100 donation, not 250

11:47

I need to see the updated press release

LB

11:49

Lisa Barbounis

Caitriona said she updated the prices on the website and the invite. The ones we sent for SD and S said 100. Are you looking at the test I sent you or the final I just sent out.

DP

12:02

Daniel Pipes

I am looking at what came by e-mail

LB

12:04

Lisa Barbounis

That must be the test email. The real ones I'm looking at were corrected

DP

12:14

Daniel Pipes

The press release is good to go

12:14

Sorry, the press release that I edited it is good to go I have to send it to you first

LB

12:39

Lisa Barbounis

As soon as you send it, I'll send it go out.

DP

13:16

Daniel Pipes

sent it

21 March 2019

DP

04:35

Daniel Pipes

You're off to London?

LB

04:39

Lisa Barbounis

I'm here. Still working though. I just updated your FB with your last tweet about an hour ago.

I won't be in any papers. No Tommy events.

DP

04:51

Daniel Pipes

you should hope over to Budapest - the gang's mostly here for a big conference starting tomorrow

LB

04:52

Lisa Barbounis

I would love that. What time does it start and who is the whole gang?

DP

04:52

Daniel Pipes

2019-03-22to24 sched-MCCollegium.docx

Not included, change data exporting settings to download.

191.3 KB

LB

04:53

Lisa Barbounis

Oh wow. That is the whole gang!

23 March 2019

DP

11:15

Daniel Pipes

please note the typo: Muslims Who Stand Up To Mullah's Are No 'Islamophobes'

25 March 2019

DP

15:25

Daniel Pipes

your weekly reports? Please send them now to Gregg and me

26 March 2019

LB

13:32

Lisa Barbounis

Sent plus a memo

13:34

I would love to pump out this video but it done by Jack Poseobiec and Mike Cernovich. It highlights our event on Qatar

13:34

<https://www.youtube.com/watch?v=IFimy3QXqSc>

27 March 2019

LB

12:57

Lisa Barbounis

<https://www.jpost.com/Arab-Israeli-Conflict/Daniel-Pipes-and-the-Israel-Victory-Project-584733>

DP

13:28

Daniel Pipes

thanks

1 April 2019

LB

14:04

Lisa Barbounis

Can you send me the pipeline media contact?

DP

14:14

Daniel Pipes

William Mayer.vcf

Not included, change data exporting settings to download.

4.1 KB

LB

14:41

Lisa Barbounis

Thank you.

2 April 2019

DP

23:14

Daniel Pipes

When can I expect to hear back from you about the civilizationist conference?

3 April 2019

06:55

LB
Lisa Barbounis

Gregg said he wanted the proposal by Friday.

06:55

I can try to speed it up if you like

DP

07:10

Daniel Pipes

That's fine.

DP

17:36

Daniel Pipes

Please make sure that the two articles about Sisi indicate that they are part of a set

LB

17:36

Lisa Barbounis

ok

DP

17:37

Daniel Pipes

Nothing is routine

5 April 2019

DP

10:08

Daniel Pipes

please send me your response to Zand's Iran idea

LB

10:48

Lisa Barbounis

Sent.

8 April 2019

DP

16:18

Daniel Pipes

Columbia press release: should say "News" and picture should be at bottom. Otherwise good.

DP

23:26

Daniel Pipes

Lisa, you need to send the Seaman press release tonight

23:27

It has to go out before elections start
9 April 2019

LB

03:09

Lisa Barbounis
I was asleep. Just sent it out.
10 April 2019

DP

23:59

Daniel Pipes
Is Tommy running?
11 April 2019

LB

02:05

Lisa Barbounis
We actually had a long conversation about this earlier tonight.

UKIP isn't going to let him in at the moment. If he runs as an independent in the NE he is likely to win. But, UKIP is threatening their relationship if he runs as an independent.

If he does that (runs, wins, and loses UKIP support) and Brexit actually happens then he loses the MEP and has no political power.

On the other hand UKIP is using him right now. What are the odds they are ever going to really let him in?

He has until April 25 to decide. What do you think.

DP

06:34

Daniel Pipes
I don't know enough to give advice
14 April 2019

DP

23:01

Daniel Pipes
Hope you are feeling better. There are MO pieces by Ibrahim and Gurfinkiel

23:04

and this too is MO - IW and the projects need to do a better job of getting materials to you:

23:04

<https://www.meforum.org/islamist-watch/58178/brooklyn-islamist-vigilantes>

23:09

another MO:

23:10

<https://www.meforum.org/islamist-watch/58152/the-new-islamist-lobby>

23:10

Good to get away from Syria and Iraq a bit

15 April 2019

DP

10:30

Daniel Pipes

hello?

LB

10:30

Lisa Barbounis

Sorry. I saw them. They will go out now. Posting them on the site. I already had them. Sam sent them to me Sunday.

10:38

I also forgot to thank you for the book

10:51

Oren's piece was already on MEFO it is scheduled to go out today at 11

LB

16:55

Lisa Barbounis



DP

18:02

Daniel Pipes

viral over what?

LB

18:02

Lisa Barbounis

The ibrehim article

DP

18:11

Daniel Pipes

of course - Notre Dame fire. Let's build on this

DP

18:38

Daniel Pipes

<https://twitter.com/DanielPipes/status/1117919761210327040>

17 April 2019

LB

15:12

Lisa Barbounis

<https://www.meforum.org/islamist-watch/58246/cair-official-i-wish-hitler-was-alive-to-f-up>

15:12

Can we mail this one out? It's doing really well on IW

DP

15:17

Daniel Pipes

Yes, just make sure with Sam that he's made the changes I requested.

LB

15:25

Lisa Barbounis

He wants to make one more correction. When he does I will mail it out. He said 40 min to an hour

DP

16:35

Daniel Pipes

ok

DP

18:33

Daniel Pipes



LB

18:34

Lisa Barbounis



DP

18:57

Daniel Pipes

s2711lennon@icloud.com does not work anymore. Do you have a current e-mail address for Tommy Robinson?

LB

18:58

Lisa Barbounis

tommy2711robinson@icloud.com

DP

18:58

Daniel Pipes

thank you

LB

18:58

Lisa Barbounis

Anytime.

DP

18:58

Daniel Pipes

He made a mess in Iceland. I guess he'll never learn.

LB

18:59

Lisa Barbounis

I spoke to him about that he wants to refund them and do an event for free for them

DP

19:01

Daniel Pipes

Good.

18 April 2019

DP

07:53

Daniel Pipes

how much of me will show on camera today?

LB

08:11

Lisa Barbounis

Mid waist up

LB

13:53

Lisa Barbounis

Where did you go?

DP

14:11

Daniel Pipes

Marnie's office

DP

23:13

Daniel Pipes

<https://www.memri.org/jttm/jihadi-ideologue-celebrates-notre-dame-cathedral-fire-threatens-jihad-against-france>

19 April 2019

DP

10:27

Daniel Pipes

Let's skip the Ibrahim press release. 1. Too much time has gone by. 2. It appears not to be jihad:

10:27

<https://www.pbs.org/newshour/world/short-circuit-likely-caused-notre-dame-fire-police-say>

LB

10:37

Lisa Barbounis

They wouldn't tell us even if it was.

24 April 2019

LB

17:31

Lisa Barbounis

If Grayson attends the gala would MEF cover his room?

DP

17:40

Daniel Pipes

sure

LB

17:42

Lisa Barbounis

Great. Thanks

25 April 2019

DP

11:54

Daniel Pipes

Tommy Robinson is launching his campaign to become a Member of the European Parliament today.

His website is www.VoteTommy.co.uk

LB

13:11

Lisa Barbounis

I was going to send that to you this morning and I got distracted by Garry's arrival!

13:12

Did you like the video?

DP

13:16

Daniel Pipes

very well done but too populist and non-specific for my taste

[Next messages](#)

EXHIBIT 89
Message from
Plaintiff to T.
Robinson

From: Lisa Barbounis
Sent: Monday, December 03, 2018 12:33 PM EST
To: Tommy Robinson <tommy2711robinson@icloud.com>
Subject: Review: Documentary Proposal
Attachment(s): "TR Rape of Britain Proposal .docx"

Yax,

Review the attached proposal. Let me know if you want any edits. If not, please send to Dr. Pipes with a short note.
pipes@meforum.org

Lisa

EXHIBIT 90

Message from Plaintiff to Pipes

To be fair, I know a lot about Tommy's plans for this project and am slightly biased. He has been really excited about it. Being here and traveling all over England interviewing these families with Tommy has been eye opening. The public isn't aware of the true extent of the problem and are completely unaware of how embedded it is with Islam. While these children are being abused they are told they are being tortured for the mere fact that they are non-Muslims. Even worse the local communities are actively covering up the crimes because they are either afraid of being labeled an Islamophobe or that they themselves will become a target. So many want to tell their story to the world. I think it would be an eye opening not only for the UK but for the Western world.

Tommy is passionate and very smart. I believe the final product will be great. I also think it is something our audience would be interested in seeing. There is also fundraising potential.

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EXHIBIT 91

Message from D. Pipes to Plaintiff

Re: TR Rape of Britain Proposal .docx

Daniel Pipes <pipes@meforum.org>

Wed 12/5/2018 11:15 AM

To: Lisa Barbounis <Barbounis@meforum.org>

Cc: Gregg Roman <Roman@meforum.org>

Lisa,

Thanks. But I am more convinced by Gregg's many doubts, and most especially that funding this transforms our support for Tommy Robinson from his right to speak to his specific message. I need to watch him more before committing to that change.

On 2018-12-04, 1:15 PM, "Lisa Barbounis" <Barbounis@meforum.org> wrote:

To be fair, I know a lot about Tommy's plans for this project and am slightly biased. He has been really excited about it. Being here and traveling all over England interviewing these families with Tommy has been eye opening. The public isn't aware of the true extent of the problem and are completely unaware of how embedded it is with Islam. While these children are being abused they are told they are being tortured for the mere fact that they are non-Muslims. Even worse the local communities are actively covering up the crimes because they are either afraid of being labeled an Islamophobe or that they themselves will become a target. So many want to tell their story to the world. I think it would be an eye opening not only for the UK but for the Western world.

Tommy is passionate and very smart. I believe the final product will be great. I also think it is something our audience would be interested in seeing. There is also fundraising potential.

EXHIBIT 92
Message from
Plaintiff to T.
Robinson

From: 12159102154@s.whatsapp.net Lisa (owner)
 To: 447729634251@s.whatsapp.net +44 7729 634251

Before you reply to Daniel's email. Let's come up with some answers to the questions.

All the criticism came from Gregg.

Participant	Delivered	Read	Played
-------------	-----------	------	--------

447729634251@s.whatsapp.net +44 7729 634251	12/5/2018 11:49:36 AM(UTC-5)	12/5/2018 11:50:02 AM(UTC-5)	
---	------------------------------	------------------------------	--

Status: Sent

Platform: Mobile

12/5/2018 11:49:34 AM(UTC-5)

447729634251@s.whatsapp.net +44 7729 634251

Oh ok I've not seen it yet

Status: Read

Platform: Mobile

12/5/2018 11:50:21 AM(UTC-5)

257

From: 12159102154@s.whatsapp.net Lisa (owner)
 To: 447729634251@s.whatsapp.net +44 7729 634251

Not good.

Participant	Delivered	Read	Played
-------------	-----------	------	--------

447729634251@s.whatsapp.net +44 7729 634251	12/5/2018 11:51:24 AM(UTC-5)	12/5/2018 11:51:54 AM(UTC-5)	
---	------------------------------	------------------------------	--

Status: Sent

Platform: Mobile

12/5/2018 11:51:23 AM(UTC-5)

EXHIBIT 93
Email to Pipes and
Roman

From: Josh Halliday
Sent: Friday, December 7, 2018 9:25:43 AM
To: Daniel Pipes Gmail;Gregg Roman
Subject: MEF involvement in Sunday's Brexit rally

Hello both,

Firstly, thank you for your response to my questions earlier this week. They will be reflected in any articles we produce. Separately, I wanted to ask more about the Middle East Forum's involvement in Sunday's Brexit rally in London. Lisa Barbounis, your executive liaison, is pictured below with the organising team at a planning meeting on 30 November along with Tommy Robinson and others. Lisa is in London today with Avi Yemini and Robinson's cousin, Kevin Carroll. Is the Middle East Forum providing funding for this event? If not, could you please clarify the Middle East Forum's role in the event, given that Lisa Barbounis was at the planning meeting and is with key organisers today. I would be grateful if you could get back to me as soon as possible as we have an urgent deadline.

Many thanks,
Josh



--

Josh Halliday
North of England correspondent
Guardian News & Media

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josh.halliday@theguardian.com

twitter: [@joshhalliday](https://twitter.com/joshhalliday)

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EXHIBIT 94
Message from
Plaintiff to D. Pipes

From: Lisa Barbounis
Sent: Friday, December 7, 2018 9:55:26 AM
To: Daniel Pipes
Cc: Gregg Roman
Subject: Re: MEF involvement in Sunday's Brexit rally

That is exactly what is going on. Noting I'm doing here is related to MEF

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From: Daniel Pipes <pipes@meforum.org>
Sent: Friday, December 7, 2018 2:53 PM
To: Lisa Barbounis
Cc: Gregg Roman
Subject: Fwd: MEF involvement in Sunday's Brexit rally

This message was sent from outside the company by someone with a display name matching a user in your organisation. Please do not click links or open attachments unless you recognise the source of this email and know the content is safe.

Lisa,

I need a quick response from you. I am inclined to say that you are in London on your own initiative and attended the planning meeting in a personal capacity, that MEF is not in any way connected to the Brexit event. Okay with you?

----- Forwarded message -----

From: Josh Halliday <josh.halliday@theguardian.com>
Date: Fri, Dec 7, 2018 at 6:26 AM
Subject: MEF involvement in Sunday's Brexit rally
To: Daniel Pipes <daniel.pipes@gmail.com>, Gregg Roman <Roman@meforum.org>

Hello both,

Firstly, thank you for your response to my questions earlier this week. They will be reflected in any articles we produce. Separately, I wanted to ask more about the Middle East Forum's involvement in Sunday's Brexit rally in London. Lisa Barbounis, your executive liaison, is pictured below with the organising team at a planning meeting on 30 November along with Tommy Robinson and others. Lisa is in London today with Avi Yemini and Robinson's cousin, Kevin Carroll. Is the Middle East Forum providing funding for this event? If not, could you please clarify the Middle East Forum's role in the event, given that Lisa Barbounis was at the planning meeting and is with key organisers today. I would be grateful if you could get back to me as soon as possible as we have an urgent deadline.

Many thanks,
Josh



--

Josh Halliday
North of England correspondent
Guardian News & Media

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EXHIBIT 95

Instagram Message Logs

Messages exported from: Lisa Reynolds (lisabeth_)
With: Facebook User

12/5/2018 12:46 PM

Facebook User

You seem to have forgotten my request.

12/5/2018 12:48 PM

Facebook User

Video call started

12/5/2018 12:48 PM

Facebook User

Video call ended

12/5/2018 1:00 PM

Facebook User

Video call started

12/5/2018 1:00 PM

Facebook User

Video call ended

12/6/2018 2:15 PM

Facebook User

Yes u do

12/6/2018 2:40 PM

Lisa Reynolds

I have no clue.

12/6/2018 3:07 PM

Facebook User

To see if you could find me a copy of the contract, i know im a pain but coul you have a look and i hope alls well

12/6/2018 3:08 PM

Lisa Reynolds

What is it that your are looking for

12/6/2018 3:08 PM

Lisa Reynolds

Call me

12/6/2018 3:10 PM

Facebook User

Thats not the sort of thing one just discloses

12/6/2018 3:12 PM

Lisa Reynolds

What are you talking about

12/6/2018 3:14 PM

Facebook User

Its a request for a contract.

12/6/2018 3:14 PM

Facebook User

You then asked me why

12/6/2018 3:14 PM

Lisa Reynolds

I'm confused

12/6/2018 3:15 PM

Facebook User

Its all very confusing im sure

12/6/2018 3:15 PM

Facebook User

Im off

12/6/2018 3:15 PM

Facebook User

Ill give you a message soon

12/6/2018 3:15 PM

Lisa Reynolds

No. Seriously

12/6/2018 3:15 PM

Facebook User

Yea seriously im asking about a contract that involves me

12/6/2018 3:16 PM

Facebook User

Phonecalls ill have to think about

12/6/2018 3:18 PM

Facebook User

Thank you for the quick response i'll drop you a message down the line and see if you found it.

12/7/2018 2:41 AM

Facebook User

Im about if you want to talk today.

12/7/2018 7:11 AM

Facebook User

Video call started

12/7/2018 7:11 AM

Facebook User

Video call ended

12/7/2018 10:33 AM

Facebook User

Right lisa i would like my contact dont play dumb please u turne on us last time this is a genuine request

12/7/2018 10:33 AM

Facebook User

Turned*

12/7/2018 10:34 AM

Facebook User

I emailed your people, nothing, i inboxed u

12/7/2018 10:34 AM

Facebook User

You pretend not to know what im on about

12/7/2018 10:34 AM

Facebook User

No more

12/7/2018 10:34 AM

Facebook User

U want to chat then lets do thag

12/7/2018 10:34 AM

Facebook User

That*

12/7/2018 10:34 AM

Facebook User

Or just get it for me please

12/7/2018 10:35 AM

Lisa Reynolds

Excuse me? I don't play dumb. I forgot you even asked. You signed the agreement and should have a copy because you signed it and sent it to us. I am not in the US right now.

12/7/2018 10:35 AM

Facebook User

I know your here, and no theres reasons i dont someone played a foul

12/7/2018 10:35 AM

Facebook User

So im asking you

12/7/2018 10:36 AM

Facebook User

So between defending a theiving liar

12/7/2018 10:36 AM

Facebook User

Fetch it for me please

12/7/2018 10:36 AM

Lisa Reynolds

I saw plenty of messages you posted out there that could be a violation of that contract.
Who is the thieving liar?

12/7/2018 10:37 AM

Facebook User

Ohhh have u

12/7/2018 10:37 AM

Facebook User

What if i told u i never saw it

12/7/2018 10:37 AM

Facebook User

So lets have it

12/7/2018 10:37 AM

Facebook User

And lets see whos is in breach of what

12/7/2018 10:38 AM

Lisa Reynolds

Who is the liar you reference

12/7/2018 10:39 AM

Facebook User

What so u can screenshot? I trusted u once and i was bitten

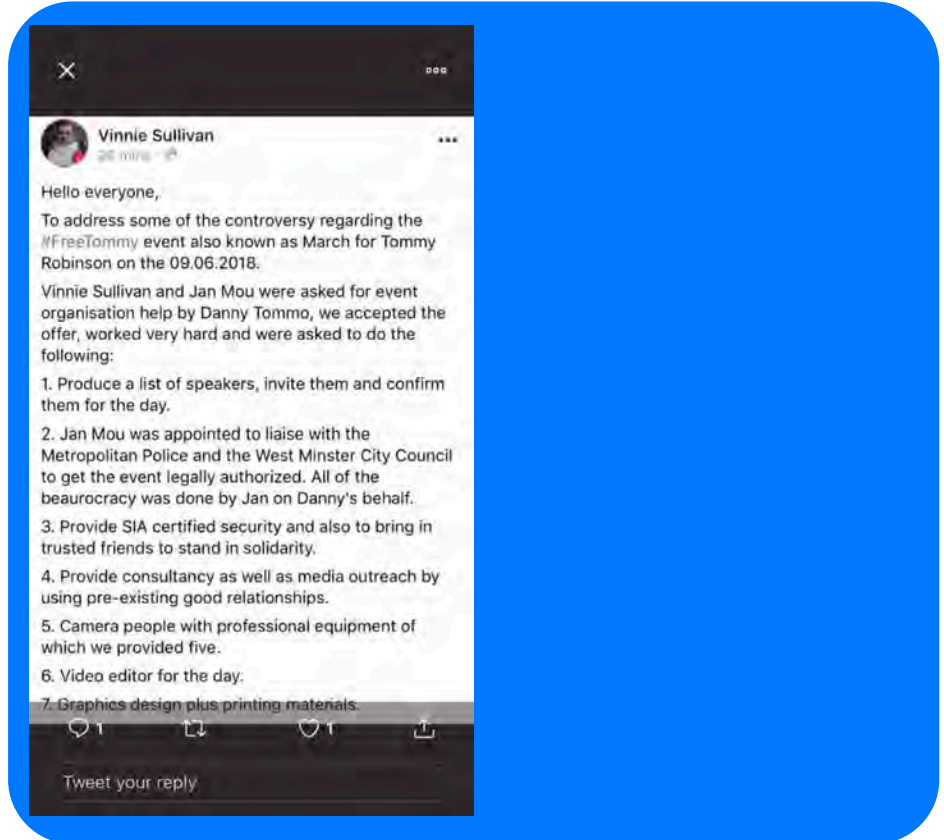
12/7/2018 10:39 AM

Facebook User

Im asking for the legal document with my name on it

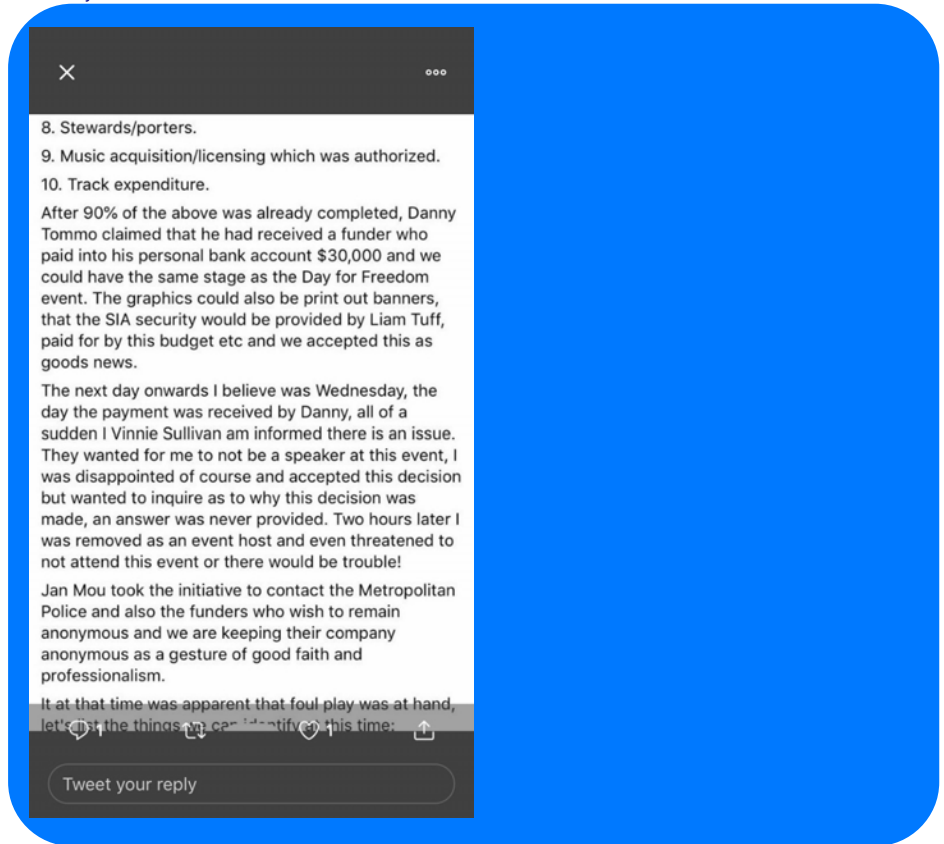
12/7/2018 10:39 AM

Lisa Reynolds



12/7/2018 10:39 AM

Lisa Reynolds



12/7/2018 10:39 AM

Facebook User

Yea?

12/7/2018 10:39 AM

Lisa Reynolds

You signed it and sent it. How come you don't have a copy?

12/7/2018 10:39 AM

Facebook User

So what

12/7/2018 10:40 AM

Facebook User

I signed it did i?

12/7/2018 10:40 AM

Facebook User

Then u have no worries do u

12/7/2018 10:40 AM

Lisa Reynolds

Who are you calling a thieving liar

12/7/2018 10:40 AM

Facebook User

Send it over

12/7/2018 10:40 AM

Facebook User

Tommo the one u gave 7 grand

12/7/2018 10:40 AM

Facebook User

The one u coached to lie to everyone

12/7/2018 10:40 AM

Lisa Reynolds

I'm not in the office. I'm on the road.

12/7/2018 10:40 AM

Facebook User

The one that beats his missis

12/7/2018 10:40 AM

Facebook User

Then ring them

12/7/2018 10:41 AM

Facebook User

The one we have a lot on

12/7/2018 10:41 AM

Facebook User

Ill wait then

12/7/2018 10:41 AM

Lisa Reynolds

You have no clue what you are talking about

12/7/2018 10:41 AM

Facebook User

You dont need to time will do that for u

12/7/2018 10:42 AM

Lisa Reynolds

I get that you are put off because the family didn't want you to speak but you are going off assumptions and not truths.

12/7/2018 10:42 AM

Facebook User

May all of the poisons that lurk in the mud hatch out, justice be done though the heavens may fall

12/7/2018 10:42 AM

Facebook User

U backed the wrong horse

12/7/2018 10:42 AM

Lisa Reynolds

I have no clue what that means.

12/7/2018 10:43 AM

Facebook User

It means all will be revealed

12/7/2018 10:43 AM

Lisa Reynolds

And I never coached anyone to lie about anything. There is no need

12/7/2018 10:43 AM

Lisa Reynolds

Not that part

12/7/2018 10:43 AM

Facebook User

You seem to not want to give it to me

12/7/2018 10:43 AM

Facebook User

Any reason?

12/7/2018 10:43 AM

Facebook User

I want to believe u

12/7/2018 10:43 AM

Facebook User

But u lied before

12/7/2018 10:43 AM

Lisa Reynolds

I don't care if you have it. I just don't have it. And I'm in London.

12/7/2018 10:43 AM

Facebook User

I know where u r

12/7/2018 10:44 AM

Lisa Reynolds

I never lied to anyone. I fought for you to get paid.

12/7/2018 10:44 AM

Facebook User

Its not rellevant

12/7/2018 10:44 AM

Lisa Reynolds

So you coming at me is unfounded.

12/7/2018 10:44 AM

Facebook User

You fought to keep me quiet

12/7/2018 10:44 AM

Facebook User

No its not

12/7/2018 10:44 AM

Facebook User

Much cane out

12/7/2018 10:44 AM

Lisa Reynolds

If that's how you want to see it

12/7/2018 10:44 AM

Facebook User

Its doesnt matter how i want to see it

12/7/2018 10:45 AM

Facebook User

If im in a legal document in entitled to see it

12/7/2018 10:45 AM

Lisa Reynolds

We came out supporting the event.

12/7/2018 10:45 AM

Lisa Reynolds

And others after it

12/7/2018 10:45 AM

Facebook User

No you allowed them to tell me i better not turn up

12/7/2018 10:45 AM

Facebook User

And i did anyway

12/7/2018 10:45 AM

Lisa Reynolds

I don't know what you are getting at

12/7/2018 10:45 AM

Facebook User

U watched us arrange it all

12/7/2018 10:45 AM

Lisa Reynolds

I didn't allow anything of the sort.

12/7/2018 10:45 AM

Facebook User

Then got on the tommo train

12/7/2018 10:45 AM

Facebook User

U did

12/7/2018 10:45 AM

Facebook User

In every way

12/7/2018 10:46 AM

Lisa Reynolds

Actually I became involved in the arranging toward the end you were out of it less than halfway through

12/7/2018 10:46 AM

Facebook User

Its not rellevant

12/7/2018 10:46 AM

Lisa Reynolds

Tommo was very helpful

12/7/2018 10:46 AM

Facebook User

Yea thanks to your ppl and no i was kicked off about 3 days before

12/7/2018 10:46 AM

Facebook User

For his 7 grand i bet

12/7/2018 10:46 AM

Lisa Reynolds

Not my people. The family and it was weeks before.

12/7/2018 10:46 AM

Lisa Reynolds

Actually danny didn't get almost anything for his participation

12/7/2018 10:47 AM

Lisa Reynolds

That's a FACT

12/7/2018 10:47 AM

Facebook User

Ohhh but he did

12/7/2018 10:47 AM

Facebook User

His missis has told me a lot

12/7/2018 10:47 AM

Facebook User

And we know more than u realise

12/7/2018 10:47 AM

Facebook User

I just want my contract

12/7/2018 10:47 AM

Lisa Reynolds

No he didn't. I have invoices for every penny. I know exactly what he got.

12/7/2018 10:47 AM

Facebook User

Thats all there is too it

12/7/2018 10:47 AM

Facebook User

Well she seems to think diff

12/7/2018 10:47 AM

Lisa Reynolds

Who is she

12/7/2018 10:48 AM

Facebook User

Shes no liar her other stories match up with screenshots

12/7/2018 10:48 AM

Facebook User

For me to know

12/7/2018 10:48 AM

Lisa Reynolds

Who?

12/7/2018 10:48 AM

Facebook User

Why would i tell u?

12/7/2018 10:49 AM

Lisa Reynolds

Because you are just making baseless claims. I was aware of every dollar that left.

12/7/2018 10:49 AM

Facebook User

If u are fishing for info use your phone and even then u wont get it

12/7/2018 10:49 AM

Facebook User

Then someone is lying either way its screenshot

12/7/2018 10:49 AM

Lisa Reynolds

I think you are making it up to bash tommy and Danny because you are jealous. There is no other reason that I can see

12/7/2018 10:49 AM

Facebook User

The man that sits in special branch parking spaces

12/7/2018 10:49 AM

Facebook User

Fine then u dont have to worry?

12/7/2018 10:49 AM

Facebook User

Send it over

12/7/2018 10:50 AM

Facebook User

We will see whos a liar

12/7/2018 10:50 AM

Facebook User

We know all

12/7/2018 10:50 AM

Facebook User

You underestimated us

12/7/2018 10:50 AM

Facebook User

Hes a grass

12/7/2018 10:50 AM

Facebook User

Who meets old bill

12/7/2018 10:50 AM

Facebook User

When he was arrested he was seen also

12/7/2018 10:50 AM

Facebook User

Saying u know who i am

12/7/2018 10:51 AM

Facebook User

We know who your actually working for and thats why you protect him.knowing full well hes a grass

12/7/2018 10:52 AM

Facebook User

May allllll of the poisons hatch out

12/7/2018 10:52 AM

Lisa Reynolds

I have no clue what you are talking about I don't know what grass is

12/7/2018 10:52 AM

Facebook User

A snitch

12/7/2018 10:52 AM

Facebook User

A fake

12/7/2018 10:52 AM

Facebook User

They let him go when he said who he was

12/7/2018 10:53 AM

Facebook User

The same guy we have a pic of his signature

12/7/2018 10:53 AM

Facebook User

Grassing the ppl he took the hostage with

12/7/2018 10:53 AM

Lisa Reynolds

Who?

12/7/2018 10:53 AM

Facebook User

Tommo

12/7/2018 10:53 AM

Lisa Reynolds

I'm lost

12/7/2018 10:53 AM

Facebook User

The firms are clocking on

12/7/2018 10:53 AM

Facebook User

Exactly

12/7/2018 10:53 AM

Lisa Reynolds

What firms

12/7/2018 10:53 AM

Facebook User

You either know and call me jealous because your mad

12/7/2018 10:53 AM

Facebook User

Or you dont and should

12/7/2018 10:53 AM

Facebook User

Either way

12/7/2018 10:53 AM

Facebook User

Contract please

12/7/2018 10:54 AM

Lisa Reynolds

No. That's a outsider view. I can't think of another reason.

12/7/2018 10:54 AM

Facebook User

Suit yourself

12/7/2018 10:54 AM

Lisa Reynolds

Spoke to you after and you were outraged

12/7/2018 10:54 AM

Facebook User

I have made my request

12/7/2018 10:54 AM

Facebook User

Corse i was

12/7/2018 10:54 AM

Facebook User

You done us over

12/7/2018 10:54 AM

Facebook User

U gave him financial insentive

12/7/2018 10:54 AM

Lisa Reynolds

Wasn't saying no to the contract I know that you don't understand my point of view

12/7/2018 10:54 AM

Facebook User

To sell out

12/7/2018 10:55 AM

Facebook User

I couldnt care less u underestimated us

12/7/2018 10:55 AM

Facebook User

And watch us get bad mouthed

12/7/2018 10:55 AM

Facebook User

No more

12/7/2018 10:55 AM

Lisa Reynolds

He didn't get anything. You got more than him

12/7/2018 10:55 AM

Facebook User

No i didnt get f all

12/7/2018 10:56 AM

Facebook User

I saw his account

12/7/2018 10:56 AM

Lisa Reynolds

You got over 900£

12/7/2018 10:56 AM

Facebook User

And a shitty stage

12/7/2018 10:56 AM

Facebook User

No

12/7/2018 10:56 AM

Facebook User

Oh did i?

12/7/2018 10:56 AM

Facebook User

Jan knows different

12/7/2018 10:56 AM

Facebook User

Theres more than one snake involved here

12/7/2018 10:56 AM

Lisa Reynolds

The money got put in his account and got paid out of there. I have receipts for everything

12/7/2018 10:56 AM

Facebook User

Now you still seem to be in defence of the grass

12/7/2018 10:56 AM

Facebook User

Sweet

12/7/2018 10:56 AM

Lisa Reynolds

I think someone is lying to you the.

12/7/2018 10:56 AM

Lisa Reynolds

Then

12/7/2018 10:57 AM

Facebook User

Then you have no worries

12/7/2018 10:57 AM

Lisa Reynolds

I'm just being honest.

12/7/2018 10:57 AM

Facebook User

I know what i know

12/7/2018 10:57 AM

Facebook User

And if u knew what i know

12/7/2018 10:57 AM

Lisa Reynolds

What are you trying to say?

12/7/2018 10:57 AM

Facebook User

You wouldnt be so funny about things

12/7/2018 10:57 AM

Lisa Reynolds

Just say it

12/7/2018 10:57 AM

Facebook User

Im saying i want my contract

12/7/2018 10:57 AM

Facebook User

And if u hadnt fucked us you would know what we do

12/7/2018 10:58 AM

Facebook User

U sold us out fair enough

12/7/2018 10:58 AM

Lisa Reynolds

What am I funny about? I could just ignore you. But I'm not. There is nothing in this for me

12/7/2018 10:58 AM

Facebook User

But i want that document

12/7/2018 10:58 AM

Lisa Reynolds

I did??

12/7/2018 10:58 AM

Lisa Reynolds

Ok.

12/7/2018 10:58 AM

Facebook User

Ignore me then

12/7/2018 10:58 AM

Lisa Reynolds

Don't you have the email you sent it from?

12/7/2018 10:58 AM

Facebook User

But youll find im bound by nothing

12/7/2018 10:58 AM

Facebook User

And were not going away

12/7/2018 10:59 AM

Lisa Reynolds

Why don't you just be honest and tell me what's going on

12/7/2018 10:59 AM

Facebook User

Why would i

12/7/2018 10:59 AM

Facebook User

U are protecting a scum bag

12/7/2018 10:59 AM

Lisa Reynolds

Because it's not getting you anywhere being cryptic

12/7/2018 10:59 AM

Facebook User

So your not on our level

12/7/2018 10:59 AM

Facebook User

Yes it is

12/7/2018 10:59 AM

Facebook User

Im asking for a document

12/7/2018 10:59 AM

Lisa Reynolds

Give me proof he is a scumbag that would help if that's the case

12/7/2018 10:59 AM

Facebook User

Your wondering why

12/7/2018 11:00 AM

Lisa Reynolds

What does one have to do with the other?

12/7/2018 11:00 AM

Lisa Reynolds

Shoot straight with me

12/7/2018 11:00 AM

Facebook User

Thats your problem and no you will go try to cover it up

12/7/2018 11:00 AM

Facebook User

No chance what like u did with me?

12/7/2018 11:00 AM

Facebook User

Na

12/7/2018 11:00 AM

Facebook User

TRR do this for free and the country

12/7/2018 11:00 AM

Facebook User

Watching u defend a dog

12/7/2018 11:00 AM

Facebook User

Makes it all clear to us

12/7/2018 11:01 AM

Lisa Reynolds

What did I do with you? No one but me thought we should pay you and we did.

12/7/2018 11:01 AM

Facebook User

Seeing u sat with him

12/7/2018 11:01 AM

Facebook User

Did it for me

12/7/2018 11:01 AM

Facebook User

I see it all now

12/7/2018 11:01 AM

Lisa Reynolds

I did actually

12/7/2018 11:01 AM

Facebook User

I heard avi is on the payroll too

12/7/2018 11:01 AM

Lisa Reynolds

When did you see me sat with him?

12/7/2018 11:01 AM

Facebook User

How many you controlling

12/7/2018 11:01 AM

Lisa Reynolds

Avi isn't on payroll! What?!

12/7/2018 11:01 AM

Facebook User

In a ukip conference

12/7/2018 11:01 AM

Facebook User

Or whatever it was

12/7/2018 11:02 AM

Facebook User

Maybe hes not thats not reliable

12/7/2018 11:02 AM

Facebook User

But i wouldnt be surprised

12/7/2018 11:02 AM

Lisa Reynolds

Where are you getting your info? I'm here in personal capacity not through MEF

12/7/2018 11:02 AM

Facebook User

Corse u r

12/7/2018 11:02 AM

Lisa Reynolds

Brexit isn't in the MEF mission. Not even close.

12/7/2018 11:02 AM

Facebook User

And im bill clinton

12/7/2018 11:02 AM

Lisa Reynolds

I swear on my children.

12/7/2018 11:03 AM

Facebook User

If u dont want to talk then were done here

12/7/2018 11:03 AM

Facebook User

Ill wait for the contract

12/7/2018 11:03 AM

Facebook User

I gave u the chance to talk via phone

12/7/2018 11:03 AM

Facebook User

All im seeing is questions

12/7/2018 11:03 AM

Facebook User

You dont give away your ppls info

12/7/2018 11:03 AM

Lisa Reynolds

Cause I'm so confused

12/7/2018 11:03 AM

Facebook User

Why would i

12/7/2018 11:03 AM

Facebook User

Your not

12/7/2018 11:03 AM

Lisa Reynolds

Your info isn't reliable.

12/7/2018 11:03 AM

Lisa Reynolds

Ok.

12/7/2018 11:03 AM

Facebook User

Your using clever tactics to disarm me

12/7/2018 11:04 AM

Facebook User

Oh but it is

12/7/2018 11:04 AM

Lisa Reynolds

I was at lunch when you called

12/7/2018 11:04 AM

Facebook User

Even has.met police on it

12/7/2018 11:04 AM

Lisa Reynolds

I swear I'm lost and your info is wayyyyy off

12/7/2018 11:04 AM

Facebook User

Or threats to me that he couldnt back up when i called it out

12/7/2018 11:04 AM

Lisa Reynolds

I have no malice toward you. I just don't understand what it is you are trying to say.

12/7/2018 11:04 AM

Facebook User

The guys he did the robbery with know he kept a LOT of coke

12/7/2018 11:05 AM

Facebook User

As did his mrs

12/7/2018 11:05 AM

Facebook User

Im asking for a contract

12/7/2018 11:05 AM

Facebook User

The one of me and jan

12/7/2018 11:05 AM

Facebook User

Jan doxed my family

12/7/2018 11:05 AM

Facebook User

Hes now in cahoots with danny

12/7/2018 11:05 AM

Lisa Reynolds

All I know is you are saying
1 Danny is a grass
2 he got more money than he did

Other than that I have no clue what you are talking about.

12/7/2018 11:05 AM

Facebook User

My mum is all over the internet

12/7/2018 11:05 AM

Facebook User

Family threatened

12/7/2018 11:05 AM

Lisa Reynolds

I thought you and Jan were friends

12/7/2018 11:05 AM

Facebook User

Oh hea deff a grass

12/7/2018 11:06 AM

Facebook User

Im not playing these games

12/7/2018 11:06 AM

Facebook User

He grassed his own mates aftet the robbery

12/7/2018 11:06 AM

Facebook User

We have the document

12/7/2018 11:06 AM

Facebook User

Among other things

12/7/2018 11:07 AM

Facebook User

Now hes asking ppl.for money and hiding it?

12/7/2018 11:07 AM

Facebook User

Tut tut

12/7/2018 11:07 AM

Lisa Reynolds

Ok but I think you think I know some weird inter-workings.

What document?! I'm getting frustrated-because I can't follow what you are saying.

12/7/2018 11:07 AM

Facebook User

My contract

12/7/2018 11:07 AM

Facebook User

End of

12/7/2018 11:08 AM

Lisa Reynolds

Ok.

12/7/2018 11:09 AM

Facebook User

So you'll send it over

12/7/2018 11:09 AM

Lisa Reynolds

Of course as soon as I get my hands on it

12/7/2018 11:09 AM

Facebook User

Soon please I feel an urge for fun

12/7/2018 11:09 AM

Lisa Reynolds

I sent an email to the lawyer who keeps them

12/7/2018 11:09 AM

Lisa Reynolds

What does that mean

12/7/2018 11:10 AM

Facebook User

Who knows

12/7/2018 11:10 AM

Lisa Reynolds

Stop being coy. Why can't you just shoot straight.

12/7/2018 11:10 AM

Lisa Reynolds

It's not helping your cause

12/7/2018 11:10 AM

Facebook User

Why are you defending a hostage taking grass and I don't need to help my case I know your involved

12/7/2018 11:11 AM

Facebook User

I don't need or want to impress you were real patriots

12/7/2018 11:11 AM

Lisa Reynolds

How am I even doing that?

12/7/2018 11:11 AM

Facebook User

Not funding addicts

12/7/2018 11:11 AM

Facebook User

I trusted u

12/7/2018 11:11 AM

Facebook User

More fool me

12/7/2018 11:11 AM

Lisa Reynolds

You say I'm defending him and I don't know where you see that

12/7/2018 11:11 AM

Facebook User

I will earn people respect in the field

12/7/2018 11:12 AM

Facebook User

Not get jumped up by those who care not for the moral cause

12/7/2018 11:12 AM

Lisa Reynolds

Unless there is proof he did something else with the money then that's a different story. But right now I have receipts and his bank info r

12/7/2018 11:13 AM

Facebook User

Then we both have interesting documents

12/7/2018 11:13 AM

Facebook User

What funnnnnn

12/7/2018 11:15 AM

Facebook User

My crew are what matter

12/7/2018 11:15 AM

Facebook User

So sharing with you is not in my interest you will say lets talk in the funture blah blah then defend our enemies

12/7/2018 11:22 AM

Facebook User



12/7/2018 11:33 AM

Facebook User

Seems strange you are involved in ukip? Someone guiding them i take it

12/7/2018 11:34 AM

Facebook User

U sat back after watching him put out lies on a tommy page putting me in danger and u thought its ok we have something on him because he breached a contract

12/7/2018 11:35 AM

Facebook User

So you sold us out for no reason but it made it clear you would if u could u felt that contract would get rid of us after seeing us put in danger and wronged u lied to us especially me

12/7/2018 11:36 AM

Facebook User

I breached nothing

12/7/2018 11:36 AM

Facebook User

Im confident but some people are not

12/7/2018 11:36 AM

Facebook User

May all of the poisons....

12/7/2018 11:48 AM

Lisa Reynolds

That's not what happened at all.

12/7/2018 11:49 AM

Facebook User

Lisa

12/7/2018 11:49 AM

Facebook User

I respect your intelligence too much to believe u

12/7/2018 11:49 AM

Facebook User

You are far brighter than u let on

12/7/2018 11:50 AM

Facebook User

Thats why you are trusted to do what u do

12/7/2018 11:50 AM

Facebook User

We are a cut above the usual grass roots ppl u deal with

12/7/2018 11:50 AM

Facebook User

We deal in info and mind games

12/7/2018 11:50 AM

Facebook User

Theres a reason no group wants it with us

12/7/2018 11:50 AM

Facebook User

And cant shut us down

12/7/2018 11:50 AM

Facebook User

Even if im locked away

12/7/2018 11:51 AM

Facebook User

The motions are put in place

12/7/2018 11:51 AM

Facebook User

Trr will push on

12/7/2018 12:01 PM

Lisa Reynolds

I appreciate the vote of confidence but I think you have me all wrong. I'm not trying to shut anybody down I think we need as many people in this fight as we can get

12/7/2018 12:04 PM

Facebook User

Then you wouldnt have lies and sold us out

12/7/2018 12:04 PM

Facebook User

You wouldnt defend the man that deliberatley used me to climb then threw us under the buss

12/7/2018 12:04 PM

Facebook User

You wouldnt persuade peoples actuons via your companies orders

12/7/2018 12:05 PM

Facebook User

You wouldnt have outcast the ONE group that tackles the left un shadow banned so so bad
cos we speak the truth funny how danny, mr scotland yard isnt

12/7/2018 12:06 PM

Lisa Reynolds

When did I lie to you? And how am I defending him. All I said is I know where the money went
and it wasn't to him

12/7/2018 12:07 PM

Lisa Reynolds

I'm here to help Tommy and help the cause I have no allegiance other than that

12/7/2018 12:08 PM

Facebook User

No your here to influence everything from ukip to minions

12/7/2018 12:09 PM

Lisa Reynolds

No.

12/7/2018 12:09 PM

Facebook User

Do u want to talk prop or not

12/7/2018 12:09 PM

Facebook User

This is a waste of time

12/7/2018 12:09 PM

Facebook User

Sweet

12/7/2018 12:09 PM

Lisa Reynolds

I'm out right now but when I have a minute I'll ring you

12/7/2018 12:09 PM

Facebook User

Ok

12/7/2018 12:09 PM

Facebook User

Im training then on a podcast soon so message me first

12/7/2018 12:09 PM

Facebook User

But dont expect answers

12/7/2018 12:10 PM

Lisa Reynolds

Will do

12/7/2018 1:11 PM

Facebook User

Video call started

12/7/2018 1:11 PM

Facebook User

Video call ended

12/7/2018 1:13 PM

Lisa Reynolds

What are you talking about?

12/7/2018 1:13 PM

Facebook User

U did that

12/7/2018 1:38 PM

Lisa Reynolds

I didn't do anything. I'm not even with danny

12/7/2018 1:39 PM

Facebook User

He rang me so u rang him

12/7/2018 1:40 PM

Facebook User

Tut tut

12/7/2018 1:40 PM

Facebook User

He gave me exactly what i needed

12/7/2018 1:40 PM

Facebook User

U should have listened

12/7/2018 1:42 PM

Lisa Reynolds

You are out of your mind. I didn't even speak to him.

12/7/2018 1:43 PM

Facebook User

Coincidence? I dont think so

12/7/2018 1:43 PM

Facebook User

So he rang me for no reason? No

12/7/2018 1:43 PM

Facebook User

He panicked

12/7/2018 1:43 PM

Lisa Reynolds

I didn't speak to him I'm with avi

12/7/2018 1:43 PM

Facebook User

He wants it tell him not to fucking run

12/7/2018 1:43 PM

Facebook User

No your lying

12/7/2018 1:44 PM

Lisa Reynolds

I'm not

12/7/2018 1:45 PM

Facebook User

Ill be able to talk in an hour or so

12/7/2018 1:46 PM

Facebook User

Get rid

12/7/2018 4:45 PM

Facebook User

I have spoken to my team who had a very serious talk with me

12/7/2018 4:45 PM

Facebook User

Nothing will occur and i will exercise restraint.

12/7/2018 4:46 PM

Facebook User

I knee jerked to his threatening phone call and as a result my guys have gone mad at my public mistakes

12/7/2018 6:02 PM

Facebook User

When i weigh it up i agree with what you do and we will be pursuing different avenues so i wish you luck we will always feel you sold our safety out.

12/7/2018 6:03 PM

Facebook User

Take care and good luck with your endeavours but i would still like that contract if it involves my safety

12/9/2018 1:12 PM

Facebook User

Your shrimp made a big mistake today then ran as usual u should have got rid of the grass, some people never learn what the rules are. I want that contract, your still paying a full time police informant? This will not do

Facebook User reacted: ❤️

Lisa Reynolds reacted: ❤️

12/9/2018 1:23 PM

Facebook User

Is there another member of your company i can deal with? One i can trust to give me my legal documents

12/9/2018 5:53 PM

Lisa Reynolds

I'm. Here. Tell me what you want to tell me I need to know

12/10/2018 2:41 AM

Facebook User

Can you be trusted? Seeing as you are more concerned with protecting your assets?

12/10/2018 2:42 AM

Facebook User

I am pro israel but not pro companies that are defending those that make the movement look like fools.

12/10/2018 2:43 AM

Facebook User

I have many reasons i have not listed to know there is complete corruption from your side and the more we are underestimated the deeper it will go.

12/10/2018 6:54 AM

Facebook User

So is there another contact for me? One i can also ask real questions

12/10/2018 8:13 AM

Facebook User

....

12/11/2018 5:50 AM

Facebook User

Fair enough lisa i tried with you and so far im getting deliberately ignored. I asked for my legal document to which you avoided, i offered to talk on the phone you didnt bother and i asked for another contact which you also avoided. You seem to be set on undermining the situation and us, i will be sure to list this all out at some point and will now go through channels to find the middle east forum even if it takes me a very long time. You like to defend grasses, we like to work towards justice you chose this path be not surprised when people start talking i have had enough of covering up for people at my expense

12/11/2018 5:58 AM

Lisa Reynolds

I was on a plane Vinnie

12/11/2018 5:58 AM

Facebook User

For a week?

12/11/2018 5:58 AM

Lisa Reynolds

What? It's 6am here. I think you are going crazy. I do.

12/11/2018 5:59 AM

Facebook User

Yea i do when im ignored so people can manipulate the movement

12/11/2018 5:59 AM

Facebook User

So whats going to happen...

12/11/2018 6:02 AM

Facebook User

As usual, nothing...

12/11/2018 9:55 AM

Facebook User

Ok lisa i shall make a video appealing to your company asking them why you are not keeping up with my request. You will hear from me soon no more games

12/11/2018 2:08 PM

Lisa Reynolds

I didn't look at the tweet but for the 20th time our legal team is not in house. You sent the document to us from your email so you should have it in your sent folder. Nevertheless, I have put in the request

12/12/2018 8:58 AM

Facebook User

No i didnt send it from my email

12/12/2018 8:59 AM

Facebook User

So for the 100th time id like the contract

12/12/2018 10:13 AM

Facebook User

The tweet was a call out that got taken off by mass reporting, you would love to have heard it especially when certain ukip controlers and protected snitches are being named. Once i have my contract you wont hear from me ill deal direct with someone shrude enough to treat us as equals as apposed to pretend to be simple

1/15/2019 9:39 AM

Facebook User

So now you are publically denying us knowing another as if m3 being recorded didn't come down to his actions. Tut tut all archived

1/15/2019 9:41 AM

Lisa Reynolds

Tommy doesn't even know you. You knew us through danny.

1/15/2019 9:41 AM

Facebook User

Haha that's about danny

1/15/2019 9:41 AM

Lisa Reynolds

What? It was a tommy feed. Pay attention

1/15/2019 9:41 AM

Facebook User

The feed about tommo messing us about

1/15/2019 9:41 AM

Facebook User

After u payed him

1/15/2019 9:42 AM

Facebook User

The one jan made

1/15/2019 9:42 AM

Lisa Reynolds

The feed was about how it's related to Tommy.

1/15/2019 9:45 AM

Facebook User



1/15/2019 9:45 AM

Facebook User

And the relation to tommy and his lies

1/15/2019 9:45 AM

Facebook User

I never wanted to be like this with u lisa

1/15/2019 9:46 AM

Facebook User

You should have been more perceptive

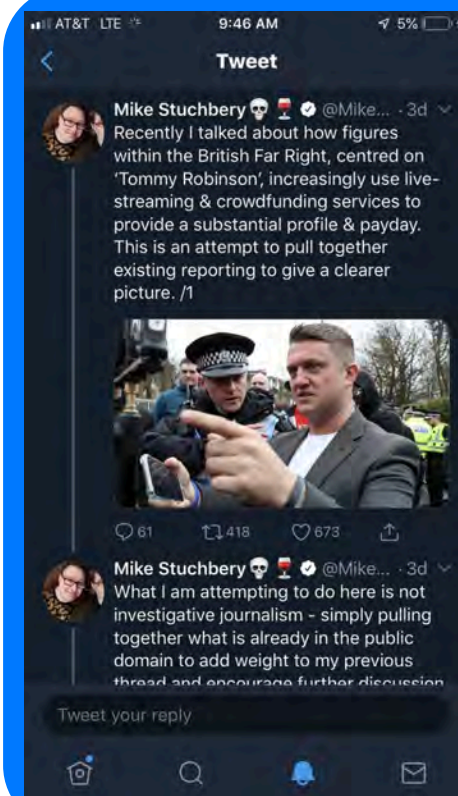
1/15/2019 9:47 AM

Lisa Reynolds



1/15/2019 9:47 AM

Lisa Reynolds



1/15/2019 9:47 AM

Lisa Reynolds

The tweet feed was about tommy. What are you on about?!

1/15/2019 9:47 AM

Facebook User

The pic I just sent u

1/15/2019 9:47 AM

Facebook User

Is my description

1/15/2019 9:47 AM

Facebook User

That's where I saw the comment

1/15/2019 9:47 AM

Lisa Reynolds

I'm starting to think that you are not mentally sound and it's scaring me.

1/15/2019 9:47 AM

Facebook User

My name is involved

1/15/2019 9:48 AM

Facebook User

I couldn't care less you know full well I'm in the right you just don't like being told with such ease

1/15/2019 9:48 AM

Facebook User

E.g. my contract

1/15/2019 9:48 AM

Facebook User

You know I'm right you know I did nothing wrong and your ppl did

1/15/2019 9:48 AM

Facebook User

So make accusations all day

1/15/2019 9:48 AM

Facebook User

I have the truth

1/15/2019 9:48 AM

Facebook User

You do not

1/15/2019 9:48 AM

Lisa Reynolds

You have it. You sent it to us for the millionth time. Keep threatening me.

1/15/2019 9:48 AM

Facebook User

In fact go public

1/15/2019 9:48 AM

Facebook User

No

1/15/2019 9:48 AM

Facebook User

I never got it

1/15/2019 9:49 AM

Facebook User

I said u would get it

1/15/2019 9:49 AM

Facebook User

I kept the screenshots

1/15/2019 9:49 AM

Facebook User

Jan never gave it to me

1/15/2019 9:49 AM

Facebook User

I told u that

1/15/2019 9:49 AM

Facebook User

Don't play dumb

1/15/2019 9:49 AM

Lisa Reynolds

You signed it!!!!!!

1/15/2019 9:49 AM

Facebook User

Your denying me the contract

1/15/2019 9:49 AM

Facebook User

Oh did I now

1/15/2019 9:49 AM

Lisa Reynolds

I'm blocking you. You are insane.

1/15/2019 9:49 AM

Facebook User

Then let's see it

1/15/2019 9:49 AM

Facebook User

Then I'll have no choice

1/15/2019 9:49 AM

Facebook User

But to alert people what's going on

1/15/2019 9:49 AM

Facebook User

For my own safety

1/15/2019 9:50 AM

Facebook User

I never saw it

1/15/2019 9:50 AM

Facebook User

So I'm asking u

1/15/2019 9:50 AM

Facebook User

For it

1/15/2019 9:50 AM

Facebook User

Yes or no

1/15/2019 9:50 AM

Facebook User

You seem worried

1/15/2019 9:50 AM

Lisa Reynolds

What is going on? Your own safety? What are you talking about? I have messages from you saying you signed it on messenger.

1/15/2019 9:50 AM

Facebook User

Show me the message

1/15/2019 9:50 AM

Facebook User

Then the contract

1/15/2019 9:50 AM

Facebook User

Then show me my signature

1/15/2019 9:50 AM

Lisa Reynolds

You are insane. Leave me alone. This is not professional in any way. Bye Vinnie.

1/15/2019 9:51 AM

Facebook User

My signature was forged

1/15/2019 9:51 AM

Facebook User

I never saw it your breaking the law

1/15/2019 9:51 AM

Lisa Reynolds

You accepted money.

1/15/2019 9:51 AM

Facebook User

Nope

1/15/2019 9:51 AM

Facebook User

Show me

1/15/2019 9:51 AM

Facebook User

Show me where my account took a penny

1/15/2019 9:51 AM

Facebook User

I'm waiting

1/15/2019 9:51 AM

Lisa Reynolds

Do whatever you want Vinnie just leave me alone.

1/15/2019 9:52 AM

Facebook User

I'm confident

1/15/2019 9:52 AM

Facebook User

Exactly

1/15/2019 9:52 AM

Facebook User

You know your lying

1/15/2019 9:52 AM

Facebook User

You just admitted to knowing

1/15/2019 9:52 AM

Facebook User

And you refuse to show me

1/15/2019 9:53 AM

Facebook User

This is the admission I needed

1/15/2019 9:53 AM

Lisa Reynolds

Knowing what?! You signed it sent it to us from your email account. And took money. You are admitting in this whole thread that you had a contract. You are asking for another copy? What planet do you live on?

1/15/2019 9:53 AM

Facebook User

Nope

1/15/2019 9:53 AM

Facebook User

Show me one scrap of proof

1/15/2019 9:53 AM

Lisa Reynolds



1/15/2019 9:53 AM

Facebook User

I'll wait here

1/15/2019 9:53 AM

Facebook User

You messed up

1/15/2019 9:53 AM

Facebook User

And u know it

1/15/2019 9:54 AM

Facebook User

And nope

1/15/2019 9:54 AM

Facebook User

Not once have I said I actually had it feel free to show me where I have

1/15/2019 9:54 AM

Facebook User

I have this all archived with a team do u?

445 total messages and 6 total images.

EXHIBIT 96
Message from D.
Pipes to Plaintiff

22:53

Daniel Pipes

awaiting your reply to my several notes

10 December 2018

LB

09:45

Lisa Barbounis

I honestly have been so busy with the march that I haven't had the opportunity to respond from my computer and wanted to give it the attention it deserves. I just got to the airport and will respond as soon as I get sorted. Sorry for the delay.

DP

09:49

Daniel Pipes

I have the sense that your position at MEF is distinctly less important than your activities with Tommy Robinson. This is not good.

LB

09:54

Lisa Barbounis

Honestly that isn't the case. It's the opposite. I was just in an awkward situation over the weekend with limited access to my computer and wanted to reply thoughtfully. Please don't think that. Im back to work and focused on MEF.

It's been a stressful few weeks with the Gregg transition and learning new job functions not to mention finals and my family.

MEF and it's mission mean the world to me. I deeply apologize if it doesn't appear that way at the moment.

DP

09:56

Daniel Pipes

I am glad to hear that but you can see why, what with the transition and the new job functions, your taking off for such a long period to do unrelated work gives me the impression that MEF is a low priority. Especially as you did not indicate that this will be happening, nor give me a decision. You just did it.

LB

09:59

Lisa Barbounis

I can see why you would feel that way. And all I can do is apologize and do better. The Tommy stuff was something I was good at. I finally felt like I was contributing. I can see why it looks the way it does. I guess I got carried away. I thought I was doing the right thing. Certainly wasn't trying to neglect MEF or hide things from you

DP

10:09

Daniel Pipes

I forgive you this. But get to work and show me that MEF and its mission are as important as you say they are. Remember, I've only worked directly with you for five weeks now. I am still getting to know you and what you can do. Show me.

LB

10:10

Lisa Barbounis

Thank you. I will.

11 December 2018

EXHIBIT 97

Fundraising Request

From: Lisa Barbounis
Sent: Wednesday, December 12, 2018 10:24 AM EST
To: Lisa Barbounis <Barbounis@meforum.org>
Subject: RE: Danny

Hello patriots,

For the past 8 months I've been going nonstop. I've organized 5 demonstrations with 200,000 attendees. I've been travelling the country with Tommy highlighting the many issues facing our nation.

It's becoming clear I can only continue with your support. As your all aware I'm not on any payroll and everything I've done has been with no salary. PayPal's deplatforming have further complicated matters. I've only ever received donations for travel expenses, etc.

I still have to visit many places in the UK before Christmas. We are organizing a charity event in the new year in addition to coordinating a larger project that will begin in January with victims and community members in 6 cities.

I know it's near to Christmas and not a great time to ask, but if you have a couple of £'s to support me it would truly be appreciated.

I don't have the means to make that happen myself. I hope you guys can support in making our mission a success.

Many thanks to all.

Danny Tommo ðŸ™~

Sent from my iPhone

EXHIBIT 98
Proposal from J.
Atkinson

From: Lisa Barbounis
Sent: Monday, January 07, 2019 11:31 AM EST
To: Daniel Pipes <pipes@meforum.org>
Subject: Proposal to MEF by Janice Atkinson
Attachment(s): "Proposal to MEF by Janice Atkinson.docx"

Dr. Pipes,

Janice Atkinson has sent over the attached amended proposal for a MEFEF grant.

I think that this would be good for us. Since video content is the way forward, this would give us extra visibility and the ability to highlight our work. We could even have our fellows and staff participate in the video content as speakers. We could also have them highlight the reports we put out such as Sam's Islamic Relief piece and publicize any video content we produce.

I think having Janice as a grantee could be beneficial in more ways than one – i.e. she has great contacts within the Civilizationist parties.

Thoughts?

Lisa

EXHIBIT 99
Correspondence
between Plaintiff and
K. Hopkins

The Big Red Bus Tour

Katie Hopkins <katie@katiehopkins.co.uk>

Thu 2/21/2019 7:21 AM

To: Lisa Barbounis <Barbounis@meforum.org>

 1 attachments (460 KB)

The Big Red Bus Tour .docx;

Hey lovely you

Super rough draft on one page - but you get the idea.

I am liking the multiple opportunities for sponsorship, segmenting exclusive access, and speakers as tour guides...the anti-Islamist bus tour!

people (like you : Amy .. Tommy?? etc) across America. Speaking in ordinary towns to ordinary people as we go. Do you reckon it's something MEF might like. I can put together a two pager if helpful. 20 speakers. 20 towns. For 2020 (But apolitical obvs)

7:04 AM

I love it! MEF will like it if there is an Islam component.

7:13 AM ✓✓



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EXHIBIT 100
Proposal from K.
Hopkins

Re: Barbounis Weekly Report 2018-02-08

Daniel Pipes <pipes@meforum.org>

Tue 2/12/2019 2:14 PM

To: Lisa Barbounis <Barbounis@meforum.org>

Now I understand why you expected me to know about Manchester, etc. "Tasks accomplished" is not a good place to provide news. Better to have sent me a report on your trip to the UK.

There's also no need to tell me routine tasks like posting articles. I am interested in what's new that you are doing. #11 is the key item here.

#14 is weary or wary?

#20 – what do you mean by involved? Also, a Reuters reporter asked me about Tommy Robinson and the BBC; I challenged him to pursue the topic, have not heard back.

#21 – glad to hear it, but when I go to <https://www.facebook.com/daniel.pipes.mef>, it's still the same old Aug. 1, 2018, posting, nothing more recent.

From: Lisa Reynolds-Barbounis <Barbounis@meforum.org>

Date: Monday, February 11, 2019 at 12:16 PM

To: Daniel Pipes <pipes@meforum.org>

Subject: Barbounis Weekly Report 2018-02-08

Apologies for being late on this. Last week was so busy.

NAME	WEEK ENDING
Lisa Barbounis	Friday, February 8, 2019
TASKS ACCOMPLISHED THIS WEEK:	
<ol style="list-style-type: none"> 1. Uploaded articles to the website and mailed out appropriate articles with assistance from Delaney. 2. Responded to email comments about our articles and tracked in Salesforce. 3. Researched the most beneficial hashtags for each day and trending accounts to get our articles maximum exposure. Our Twitter and FB numbers are up significantly. 4. Researched and implemented Meltwater. It is up and running. Sam loves it. 5. Posted articles on Facebook. 6. Mailed out articles. 7. Topic and speaker for conference call secured. 8. Arranged fellows and staff to come to the office to film for MEF TV. 9. Qatar write up for Marc. 10. Followed up on media requests for Speyer and Frantzman. No one was biting. 11. Followed up with media. Secured a meeting with Foreign Affairs Correspondent Nahal Toosi from Politico, David Kirkpatrick, Journalist from NYT in London, Sorhab Ahmari would like to meet at the end of April. 12. Brussels was interesting. Made friends with Katie Hopkins, Stefan Molyneux, Imam Tawhidi, James Delingpole. The speeches ranged from all different topics around free speech 3 of which included Islamism. The turnout was awful. Maybe 10 people. 13. We all attended a dinner the first night. We went over each of our interests, what we do and how we got there. We had a conversation on how to stop censorship on our 	

- topics and everyone in the room agreed to form a coalition to do events together and coordinate how to fight deplatforming and get our message out. Amy Mek, Imam Tawhidi, Katie Hopkins and I all really hit it off. We went out on our own after the thank you dinner. I have all of their information. Imam Tawhidi would like to do more work with MEF. Everyone had positive things to say about you and MEF. They are all following and retweeting our work now. Hopefully, we will get more exposure due to the connections.
14. Many people were weary of Janice Atkinson. She likes to gossip and seems to have issues with many people. I never told her the approved amount for funding her grant. I still think it may be beneficial for us to fund her grant. She would like to have a call with you next week to discuss her plans and your thoughts.
 15. I did a little interview with her on camera. She told me we were just having a little meeting and when I showed up there were cameras. She put me on the spot. But I think it went well. I spoke about our involvement with Tommy and kept to our narrative stating its about his right to speak and not about our organization having a position on Tommy himself. However, I haven't heard what she plans to do with the video and she hasn't sent it to me yet.
 16. Janice is also looking for help getting into and speaking at CPAC this year.
 17. Unfortunately, due to my accident I missed the other conference and the screening of Borderless.
 18. I started an article on the Brussels event. I am waiting for the rest of the videos to come out so I can get better quotes.
 19. Major developments with the Tommy Robinson BBC saga. I have all of the video evidence. Tommy is planning a huge screening of his footage outside of the BBC n Manchester on Saturday Feb 23. I will be going just for Saturday and Sunday. I will also meet with the NYT journalist that Sunday. Would you like to attend and speak about deplatforming and censorship? This will be a huge event we are looking at 30k people.
 20. I also pitched the story to Fox and the NYT and am waiting to hear back. Would you like MEF to be involved? The narrative would be that BBC or the main stream media has an agenda to take down those who don't agree with their narrative on Islamism. It will get us a lot of press.
 21. Began posting on your Facebook page. The numbers are way up and we are getting new followers.
 22. Retrieved our deplatforming event in DC's footage that was lost. Sent it to Rebel for editing.
 23. Spoke with Ashley about media targets and plans for getting better placement.
 24. Pitched Op-Ed from A.J. Caschetta to The Hill

Delaney

25. Update media contacts master spreadsheet
 26. Sent WWDB 2/6 radio guest information
 27. Upload MEFO articles daily
 28. Posted on social media daily
 29. Prepared camera tech etc. for Grayson's visit to begin MEF TV project
 30. Uploaded and edited YouTube videos from Qatar conference
 31. Uploaded Qatar conference press release onto MEFO and loaded into MailChimp
 32. Updated MEFO Spotlight section to highlight Qatar work
1. Loaded all Qatar articles into MailChimp

33. Gathered list of New York media outlets for meetings for Frantzman and Speyer
34. Gather list of media outlet contacts for Cliff
35. Posted Qatar YouTube videos on MEFO
36. Send invites to local fellows to be interviewed for MEF TV in Philly office for coordination with Lisa

TASKS PLANNED FOR NEXT WEEK:
Lisa

1. Filming for MEF TV Monday-Wed with Grayson
2. Training session on how to film with the Rebel
3. Finish Brussels article
4. Conference call invite
5. MEFO articles
6. Maintain social media
7. Follow up on meetings with editors
8. Contact speakers for the Gala
9. Arrange, format, and promote

Delaney – I addition to her daily tasks:

1. Learn how to film MEF TV
2. Film speakers
3. Send WWDB radio guest information
4. Confirm guests for record radio shows
5. Updated written articles spreadsheet daily

COMMENTARY ON LONG TERM PROJECTS:

1. Need to eventually complete the Civilizationist speaker research. I know you told me to hold off. Are you still interested in pursuing this? I think it is a great idea.

QUESTIONS OR FOLLOW UP NEEDED YOU NEED TO MOVE A PROJECT/TASK FORWARD:
ADDITIONAL COMMENTS:

EXHIBIT 101
Message from D.
Pipes to Plaintiff

15 February 2019

DP

09:29

Daniel Pipes

I think you are dragging us into the Brexit issue and generally becoming too close to Tommy Robinson

09:29

https://twitter.com/MikeStuchbery_/status/1096166169940234243

09:29

We have to stay out of unrelated topics and keep our distance

LB

09:31

Lisa Barbounis

Will do. I did say on that feed that we had nothing to do with that.

09:34

Did you get my email about the articles from yesterday?

And! We have one of the videos almost completely edited. I should have it in an hour or two to send to you. I think these will be great!

DP

09:43

Daniel Pipes

1. Yes, but denial is not what we need.

2. Yes, but focused on writing at the moment.

3. Good

09:52

1. Being defensive is not healthy for us

LB

09:54

Lisa Barbounis

Understood.

DP

09:54

Daniel Pipes

In this business, there really is no personal capacity. If you raise orchids, sure. But not topics related to MEF's

LB

09:55

Lisa Barbounis

Agreed. I'll be more careful. And I appreciate the feedback.

09:55

I take it seriously.

EXHIBIT 102

Message from Plaintiff

----- Original Message -----

From: press@trcommunication.co.uk

To: dseymour@fb.com, tommy2711robinson@icloud.com

Date: 27 February 2019 at 17:16

Subject: Retrieval of data from banned page

Dear Don,

I am the Director of Communication for Tommy Robinson (copied). I got your email from a member of Congress that is working with us on this issue.

We are looking to retrieve all the data from Tommy Robinson's personal profile (Stephen Lennon) and his page (Tommy Robinson). While we are aware Zuckerberg testified before of Congress stating that users own their own data there seems to be no way to retrieve it once the account has been deactivated by Facebook.

Could you kindly advise us on how to obtain this data for the accounts above?

Thank you in advance for your cooperation.

Sincerely,

Lisa Reynolds

Director of Communications

TR News

www.TR.News

c: +1 215-910-2154

EXHIBIT 103
Message from D.
Pipes to Plaintiff

4 March 2019

LB

06:17

Lisa Barbounis

04.03.2019 06:17:33

Spoke to Tommy this morning. He very much wants to sue Facebook. I emailed the Facebook congressional liaison for assistance retrieving the data. They should hand it over because Zuckerberg testify before Congress that users own their own data. I'm awaiting a response. If I don't get one soon we could ask a member office to reach out.

Tommy also wants to do a big Censorship demonstration with people who were censored for views on Islam like our deplatforming event just bigger. He is looking for funding.

06:17

And I'll be in on time today despite the snow.

DP

07:18

Daniel Pipes

Right, we can't do anything until he gets his Facebook data and someone reliable goes through it all - I wonder how much - to verify there is nothing that threatens violence to Muslims. Not a small undertaking, I expect.

Funding street demonstrations was an exception in 2018 due to Tommy Robinson's urgent circumstances. I don't see this as something we'll do again in the future.

LB

07:24

Lisa Barbounis

You asked about the man helping us with Tommy's visa. His name is Terry Giles and apparently he is very well connected and loaded. I am in regular contact with him. We should try to get him to be a donor. <https://goosesocietyoftexas.com/terry-giles/>

DP

07:26

Daniel Pipes

Too bad - was in Houston two days ago, but I plan to be back. Please ask Caitriona to add him to Salesforce.

LB

07:26

Lisa Barbounis

Will do.

LB

09:12

Lisa Barbounis

Might Shillman be interested in funding Tommy again directly?

DP

09:39

Daniel Pipes

I don't know but it's not our first priority with him

EXHIBIT 104
Message from
Plaintiff to D. Thomas

447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 58137
 File name: f059640e-2040-4528-aa18-05746c539cd6.opus
 Path:
<https://mmg.whatsapp.net/d/f/AsDc2RfgNtqRXa9j2k7cdfKaQRB9EU4IFpiAkTHFjx7h.e>
 nc
 f059640e-2040-4528-aa18-05746c539cd6.opus

Platform: Mobile

3/3/2019 5:22:31 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
 To: 447900171112@s.whatsapp.net Danny Tommo

It's 5am I'm in bed with the kids. Can't listen

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 5:22:56 AM(UTC-5)		

Status: Sent

Platform: Mobile

3/3/2019 5:22:54 AM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Ok speak soon

Status: Read

Platform: Mobile

3/3/2019 5:25:05 AM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Tommy said will MEF help with the censorship demo costs

Status: Read

Platform: Mobile

3/3/2019 5:37:46 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
 To: 447900171112@s.whatsapp.net Danny Tommo

Very likely because we are going to sue FB for him and the demo is part of that.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 5:38:39 AM(UTC-5)		

Status: Sent

Platform: Mobile

3/3/2019 5:38:38 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

I haven't talked to DP about that yet because I'm still waiting to hear back from Fb. We need Tommy's data.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 5:39:23 AM(UTC-5)		

Status: Sent
Platform: Mobile

3/3/2019 5:39:21 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

But that is the stuff we pay for. Not bbc or brexit. It all comes out of our legal fund.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 5:41:18 AM(UTC-5)		

Status: Sent
Platform: Mobile

3/3/2019 5:41:17 AM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Ok kl, need to get clarification on that before we release the date mate

Status: Read
Platform: Mobile

3/3/2019 8:47:47 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Of course. There also needs to be a plan of speakers and costs. Gregg is gone and DP likes to know what he is up against beforehand. So we will need to know estimated costs speakers location etc.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 8:51:18 AM(UTC-5)		

Status: Sent
Platform: Mobile

3/3/2019 8:51:17 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Pipes will be in the office tomorrow. Get me what you can by then. What tommy is thinking and I'll go from there.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 8:52:32 AM(UTC-5)		

Status: Sent
Platform: Mobile

3/3/2019 8:52:31 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

I assume you will be home today. Do yourself a favor and delete all of our messages.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 9:10:12 AM(UTC-5)		

Status: Sent
Platform: Mobile

3/3/2019 9:10:09 AM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Just deleted everything, and I'll get you the info asap

Status: Read
Platform: Mobile

3/3/2019 9:17:45 AM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 66242
File name: 0ff1bdda-b90b-4fbd-b4ce-5cbeef54e7f3.opus
Path:
https://mmg.whatsapp.net/d/f/Am2Knn08mBlXwD1OFyi_VQu5K4fqlAH1ISUOGn8WEtaX.enc
0ff1bdda-b90b-4fbd-b4ce-5cbeef54e7f3.opus

Platform: Mobile

3/3/2019 9:53:00 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Happy to oblige.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 10:15:33 AM(UTC-5)		

Status: Sent
Platform: Mobile

3/3/2019 9:55:36 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

But seriously stop making me look bad to save your ass. Ya?

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 10:15:33 AM(UTC-5)		

Status: Sent
Platform: Mobile

3/3/2019 9:56:35 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Why don't you start manning up and being honest and start from scratch. If you want to have a good relationship with her going forward that is the only way.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 10:15:34 AM(UTC-5)		

Status: Sent
Platform: Mobile

3/3/2019 10:02:07 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

And honestly I'd prefer to be out of all of this. It's been shit since I've met you. You have only hurt all those that walk in your path. And now I'm being the sacrificial lamb to save your ass. How do I deserve even being in all of this? Every day for the last 3 days I've been woken up at 3 or 5 am with this shit. So please don't screw me over in this process. I have been nothing but good to everyone and I'm the one getting the shit end of the deal over and over.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 10:15:34 AM(UTC-5)		

Status: Sent
Platform: Mobile

3/3/2019 10:14:24 AM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

I understand, from today we won't be speaking about any of this again. I promise x

Status: Read
Platform: Mobile

3/3/2019 10:16:30 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Raheem just wrote me an apology.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 2:14:04 PM(UTC-5)		

Status: Sent
Platform: Mobile

3/3/2019 12:01:50 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Fuck him !! Only because the party is over !!!

Status: Read
Platform: Mobile

3/3/2019 2:14:28 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Exactly. I'm fuming.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 2:14:42 PM(UTC-5)		

Status: Sent

Platform: Mobile

3/3/2019 2:14:41 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Attachments:



Title: I can't take much more of her bipolar disorder.
Size: 156252
File name: 00f28434-c64a-46bd-af41-6cfd1a359890.jpg
Path: https://mmg-fna.whatsapp.net/d/f/AkIaqFKiV2HCOLq8mLnME_ndb5cIfpUJGb4CGnueRoTZ.enc
00f28434-c64a-46bd-af41-6cfd1a359890.jpg

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 2:53:25 PM(UTC-5)		

Status: Sent

Platform: Mobile

3/3/2019 2:53:24 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

I'm the fucking abnormal one right? I don't stay with a guy that sleeps with my stepmom. I'm not the one that can't function like a normal adult.

I have had absolutely enough of the threats too. She gives me one more....I'm getting really really pissed.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 4:00:53 PM(UTC-5)		

Status: Sent

Platform: Mobile

3/3/2019 2:56:28 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Must be exhausting to blame everyone else for your issues.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 4:00:53 PM(UTC-5)		

Status: Sent

Platform: Mobile

3/3/2019 3:00:57 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Lisa this needs to all go away, Tommy's address has just been put back online for everyone to see. We now have a massive problem, just keep her blocked

Status: Read

Platform: Mobile

3/3/2019 4:03:13 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

She's blocked. And I saw.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 4:03:44 PM(UTC-5)		

Status: Sent

Platform: Mobile

3/3/2019 4:03:43 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)

Let me know what he needs from us.

Status: Sent

Platform: Mobile

3/3/2019 4:03:54 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

We need to concentrate, it's just got very serious

Status: Read

Platform: Mobile

3/3/2019 4:03:59 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

I agree.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 4:04:09 PM(UTC-5)		

Status: Sent

Platform: Mobile

3/3/2019 4:04:08 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

I just got annoyed for a min

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 4:04:37 PM(UTC-5)		

Status: Sent

Platform: Mobile

3/3/2019 4:04:36 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

He needs to sell his house and move to a house with gated security

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 4:05:35 PM(UTC-5)		

Status: Sent
Platform: Mobile

3/3/2019 4:05:34 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

I know mate not good

Status: Read
Platform: Mobile

3/3/2019 5:37:20 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Mate. That ms twice now. You have never called me that ever. this is gonna be fun. You can just leave it out.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 5:41:02 PM(UTC-5)		

Status: Sent
Platform: Mobile

3/3/2019 5:41:01 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Status: Read
Platform: Mobile

3/3/2019 6:03:17 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Sorry

Status: Read
Platform: Mobile

3/3/2019 6:03:18 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Lol

Status: Read
Platform: Mobile

3/3/2019 6:03:19 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Send me the link of them going to Tommy's house

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 7:00:20 PM(UTC-5)		

Status: Sent

Platform: Mobile

3/3/2019 6:37:39 PM(UTC-5)

Forwarded

447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 141354
File name: 09da0bc6-bf6b-4a7b-baf9-270f114121b5.jpg
Path: https://mmg-fna.whatsapp.net/d/f/AssNYjPt87IYCZoPK2pEvW8A_7sRvw9etxOrUaqMzFDm.enc
[09da0bc6-bf6b-4a7b-baf9-270f114121b5.jpg](https://mmg-fna.whatsapp.net/d/f/AssNYjPt87IYCZoPK2pEvW8A_7sRvw9etxOrUaqMzFDm.enc)

Status: Read

Platform: Mobile

3/3/2019 7:06:49 PM(UTC-5)

Forwarded

447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 64756
File name: 4b4b2df0-9dd1-4a3a-abdd-10130d39910a.jpg
Path: <https://mmg-fna.whatsapp.net/d/f/Anvw5TUb9BQrIDk1tqBole5mNYjskzYhzW7pe96gwOUD.enc>
[4b4b2df0-9dd1-4a3a-abdd-10130d39910a.jpg](https://mmg-fna.whatsapp.net/d/f/Anvw5TUb9BQrIDk1tqBole5mNYjskzYhzW7pe96gwOUD.enc)

Status: Read

Platform: Mobile

3/3/2019 7:06:50 PM(UTC-5)

Forwarded

447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 95361
File name: 05ae2a5e-afd5-4c89-9a64-333055acccac.jpg
Path: https://mmg-fna.whatsapp.net/d/f/AgurGeofvMRGkTC7Ob_3VvGh6L0VbvnvAbJ5jzl92bTQ.enc
[05ae2a5e-afd5-4c89-9a64-333055acccac.jpg](https://mmg-fna.whatsapp.net/d/f/AgurGeofvMRGkTC7Ob_3VvGh6L0VbvnvAbJ5jzl92bTQ.enc)

Status: Read

Platform: Mobile

3/3/2019 7:06:50 PM(UTC-5)

Forwarded

447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 126227
File name: 5945ada4-1e39-4bd2-9ed8-7010f5140ea9.jpg
Path: https://mmg-fna.whatsapp.net/d/f/AlSv82iXYMSGU1wrjQ5CK-jm9TjD4RVcOKRXc_Vc3Vmc.enc
[5945ada4-1e39-4bd2-9ed8-7010f5140ea9.jpg](https://mmg-fna.whatsapp.net/d/f/AlSv82iXYMSGU1wrjQ5CK-jm9TjD4RVcOKRXc_Vc3Vmc.enc)

Status: Read

Platform: Mobile

3/3/2019 7:06:50 PM(UTC-5)

Forwarded

447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 83185
File name: e64408eb-0290-4392-8457-e3c2d367fea2.jpg
Path: <https://mmg-fna.whatsapp.net/d/f/At8SNmrhl2BPWVQHQsl0dc36-FAybeK7c--9CsNQGcU.enc>
[e64408eb-0290-4392-8457-e3c2d367fea2.jpg](https://mmg-fna.whatsapp.net/d/f/At8SNmrhl2BPWVQHQsl0dc36-FAybeK7c--9CsNQGcU.enc)

Status: Read

Platform: Mobile

3/3/2019 7:06:51 PM(UTC-5)

Forwarded

447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 71812
File name: 2e6a75b2-f9bb-4855-baa3-06e8c55880ef.jpg
Path: <https://mmg-fna.whatsapp.net/d/f/ArLaNAamGHCM4qwm4f8874uZN2mogGRaMAZGsMylebcS.enc>
[2e6a75b2-f9bb-4855-baa3-06e8c55880ef.jpg](https://mmg-fna.whatsapp.net/d/f/ArLaNAamGHCM4qwm4f8874uZN2mogGRaMAZGsMylebcS.enc)

Status: Read

Platform: Mobile

3/3/2019 7:06:51 PM(UTC-5)

Forwarded

447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 107033
File name: 5ffb2b72-b5aa-4265-b656-1341ef6df71b.jpg
Path: https://mmg-fna.whatsapp.net/d/f/ApFCRmmBd2LCZDK58njxuK3Oo8PVnqIFWLrwnDnVI-QG.enc
5ffb2b72-b5aa-4265-b656-1341ef6df71b.jpg

Status: Read

Platform: Mobile

3/3/2019 7:06:51 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

This is the guy

Status: Read

Platform: Mobile

3/3/2019 7:06:54 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Where is the video

Participant	Delivered	Read	Played
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447900171112@s.whatsapp.net Danny Tommo	3/3/2019 7:07:06 PM(UTC-5)		
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Status: Sent

Platform: Mobile

3/3/2019 7:07:05 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Go to Mike stursbury twitter go down

Status: Read

Platform: Mobile

3/3/2019 7:07:41 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Is this it? <https://youtu.be/nBsYS97PZXs>

Participant	Delivered	Read	Played
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447900171112@s.whatsapp.net Danny Tommo	3/3/2019 7:08:07 PM(UTC-5)		
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Status: Sent

Platform: Mobile

3/3/2019 7:08:06 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

At least they didn't show the house or Jenna

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 7:09:59 PM(UTC-5)		

Status: Sent

Platform: Mobile

3/3/2019 7:09:57 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

How can we get at this guy without tommy getting in trouble

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/3/2019 7:11:31 PM(UTC-5)		

Status: Sent

Platform: Mobile

3/3/2019 7:11:30 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 48115
File name: 27e0e323-f418-424e-bbbb-7e92585ca161.mp4
Path: https://mmg-fna.whatsapp.net/d/f/At-39WVLyOm_7AgBren1FqDyzrupZSlwPH5u-en0i0aT.enc
[27e0e323-f418-424e-bbbb-7e92585ca161.mp4](https://mmg-fna.whatsapp.net/d/f/At-39WVLyOm_7AgBren1FqDyzrupZSlwPH5u-en0i0aT.enc)

Status: Read

Platform: Mobile

3/4/2019 3:43:59 AM(UTC-5)

System Message System Message

Missed Voice Call

Platform: Mobile

3/4/2019 4:40:16 AM(UTC-5)

System Message System Message

Missed Voice Call

Platform: Mobile

3/4/2019 5:16:08 AM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

<https://youtu.be/D1TnBGEGCdc>

Status: Read

Platform: Mobile

3/4/2019 5:46:01 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

<https://www.theguardian.com/world/2019/mar/03/new-ukip-members-shifting-party-far-right>

Attachments:



Title: Revealed: Ukip membership surge shifts party to far right
Size: 5357
File name: fc0e634e-ee9b-4123-9b4a-caa95e675b1b.thumb
[fc0e634e-ee9b-4123-9b4a-caa95e675b1b.thumb](#)

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/4/2019 6:01:45 AM(UTC-5)		

Status: Sent

Platform: Mobile

3/4/2019 6:01:42 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Tell Nigel and Raheem to suck it.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/4/2019 6:01:58 AM(UTC-5)		

Status: Sent

Platform: Mobile

3/4/2019 6:01:56 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Ask tommy if he did a podcast with Delingpole or if it was just an interview

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/4/2019 6:27:46 AM(UTC-5)		

Status: Sent

Platform: Mobile

3/4/2019 6:27:45 AM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 21254
File name: 08a769ac-9156-4900-89b1-17b730ecdd13.opus
Path: https://mmg.whatsapp.net/d/f/Ak_MMHEsdQkzKh2Hr07p0NRtRWIfJcG2os5h-U-E-wEI.enc
[08a769ac-9156-4900-89b1-17b730ecdd13.opus](#)

Platform: Mobile

3/4/2019 6:31:20 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 143083

File name: c0e354eb-b116-481f-b5c4-5e95f2f7d37b.jpg

Path: https://mmg-fna.whatsapp.net/d/f/ApnlkOKQivO2yh1ovaJeRgeTGB-ai6o6j2QkmH8rwCbK.enc

c0e354eb-b116-481f-b5c4-5e95f2f7d37b.jpg

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/4/2019 2:13:42 PM(UTC-5)	3/4/2019 2:21:30 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/4/2019 1:38:00 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

The lawyer was in today and we have an Israeli looking into hacking your data. He can apparently pull from inactive accounts.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/4/2019 2:13:42 PM(UTC-5)	3/4/2019 2:21:30 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/4/2019 1:38:12 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

You deleted this message

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/4/2019 2:13:42 PM(UTC-5)		

Status: Sent

Platform: Mobile

3/4/2019 1:38:12 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

We have a little issue. But let's ask shillman directly before you go to Jones.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/4/2019 2:13:42 PM(UTC-5)	3/4/2019 2:21:30 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/4/2019 1:38:49 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 48190
 File name: 40572d77-9459-46d5-a549-fd54b7b45fff.opus
 Path: https://mmg.whatsapp.net/d/f/ApEMu1JeKVzGAzBNiodaFcC-30HYqkWzPGI03ywyifi2.enc
 40572d77-9459-46d5-a549-fd54b7b45fff.opus

Platform: Mobile

3/4/2019 2:30:47 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
 To: 447900171112@s.whatsapp.net Danny Tommo

It's a demo no. Legal fund yes. However we can go to shillman first directly before tommy goes to jones.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/4/2019 3:14:08 PM(UTC-5)	3/4/2019 3:14:39 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/4/2019 2:59:49 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
 To: 447900171112@s.whatsapp.net Danny Tommo

I have a plan. I'm just need tommy to speak with me first.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/4/2019 3:14:09 PM(UTC-5)	3/4/2019 3:14:39 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/4/2019 3:00:17 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
 To: 447900171112@s.whatsapp.net Danny Tommo

I sent tommy shillmans contact info. He can either call him and thank him for his previous support and talk about what happened with the censorship and his plans or I can write an email and send it out for him

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo		3/4/2019 3:15:41 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/4/2019 3:15:39 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

We have a hacker trying to get his data from FB as a work around

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo		3/4/2019 3:16:10 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/4/2019 3:16:08 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 160576
File name: 89de2771-4ca4-4104-a933-c403370716ba.opus
Path:
https://mmg.whatsapp.net/d/f/AhstvUOFir13h8Z60gUdjL0KVhin9fX_2KRZ7Wj96qWR.enc
89de2771-4ca4-4104-a933-c403370716ba.opus

Platform: Mobile

3/4/2019 3:16:35 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Just ring me.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/4/2019 3:18:02 PM(UTC-5)	3/4/2019 3:34:12 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/4/2019 3:17:59 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Apparently you can't just download it when the account is deactivated. Can you try your hand at it on your old account?

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/4/2019 3:18:51 PM(UTC-5)	3/4/2019 3:34:12 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/4/2019 3:18:50 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

I emailed the Facebook congressional liaison a day ago requesting the data and no response yet

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/4/2019 3:19:24 PM(UTC-5)	3/4/2019 3:34:12 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/4/2019 3:19:22 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Spoke to tommy

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo		3/4/2019 3:34:12 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/4/2019 3:28:53 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 54555
File name: 66509602-65b0-4222-aace-47c6dc19804a.opus
Path: <https://mmg.whatsapp.net/d/f/Ap3OmPSGuOXI1CP4zzeLY-6eUxK4lebXm6VQ0FZjxgLe.enc>
[66509602-65b0-4222-aace-47c6dc19804a.opus](https://mmg.whatsapp.net/d/f/Ap3OmPSGuOXI1CP4zzeLY-6eUxK4lebXm6VQ0FZjxgLe.enc)

Platform: Mobile

3/4/2019 3:34:55 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Can you look at it

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/4/2019 3:35:37 PM(UTC-5)	3/4/2019 6:01:14 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/4/2019 3:35:36 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 9870
File name: 77ea8931-c6b4-4d19-8345-d2aa02f19655.opus
Path:
https://mmg.whatsapp.net/d/f/AqJ9J6D66AtxuFcY1itkPP_LAHnvUTv1BgyWBn4N-Di7.enc
[77ea8931-c6b4-4d19-8345-d2aa02f19655.opus](https://mmg.whatsapp.net/d/f/AqJ9J6D66AtxuFcY1itkPP_LAHnvUTv1BgyWBn4N-Di7.enc)

Participant	Delivered	Read	Played
447900171112 @s.whatsapp. net Danny Tommo	3/4/2019 3:36:34 PM(UTC-5)	3/4/2019 6:01:14 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/4/2019 3:36:30 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 15852
File name: 36343e6b-6ba2-43b2-bdc0-f409c38a90df.opus
Path:
<https://mmg.whatsapp.net/d/f/AgStUkrvly5pcR1UhPPeR81SzKdogJtjdiGqmwouseBk.nc>
[36343e6b-6ba2-43b2-bdc0-f409c38a90df.opus](https://mmg.whatsapp.net/d/f/AgStUkrvly5pcR1UhPPeR81SzKdogJtjdiGqmwouseBk.nc)

Participant	Delivered	Read	Played
447900171112 @s.whatsapp. net Danny Tommo	3/4/2019 3:36:40 PM(UTC-5)	3/4/2019 6:01:14 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/4/2019 3:36:39 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

I asked tommy to give you his login info

Participant	Delivered	Read	Played
447900171112 @s.whatsapp. net Danny Tommo	3/4/2019 3:52:30 PM(UTC-5)	3/4/2019 6:01:14 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/4/2019 3:52:29 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Make sure you ask tommy for the passwords.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/5/2019 10:59:22 AM(UTC-5)	3/5/2019 11:07:16 AM(UTC-5)	

Status: Sent

Platform: Mobile

3/5/2019 10:59:21 AM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Again I just sent a message to tommy about the password to his FB so you can try and get the data. The lawyers need it ASAP. I know he has a lot going on but you need to stay on him too!

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/5/2019 1:30:26 PM(UTC-5)	3/5/2019 1:30:30 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/5/2019 1:30:24 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

I'll message him now

Status: Read

Platform: Mobile

3/5/2019 1:30:52 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Fb
stephenyaxlennon@btinternet.com
jenna271182

See if you can pull anything

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/5/2019 2:39:46 PM(UTC-5)	3/5/2019 3:31:30 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/5/2019 2:39:44 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

OK brilliant

Status: Read

Platform: Mobile

3/5/2019 3:31:38 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Since you take for fucking ever. I tried and can't get shit

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/5/2019 3:31:43 PM(UTC-5)	3/5/2019 3:37:16 PM(UTC-5)	

Status: Sent

Platform: Mobile

3/5/2019 3:31:42 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

OK I'll have a go when I get to Luton just driving

Status: Read

Platform: Mobile

3/5/2019 3:37:30 PM(UTC-5)

447900171112@s.whatsapp.net Danny Tommo

Attachments:



Size: 25113
File name: 170fc73a-50f4-4f0c-a215-b4e71cf48a73.opus
Path:
<https://mmg.whatsapp.net/d/f/Apxsl4k5VCVcl0i937T84beqdzl8wvKs4ZspvyqvTvhJ.enc>
[170fc73a-50f4-4f0c-a215-b4e71cf48a73.opus](#)

Platform: Mobile

3/5/2019 5:43:06 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

I have the best way to make sure that Happens.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net t Danny Tommo	3/5/2019 5:48:05 PM(UTC-5)	3/6/2019 6:49:17 AM(UTC-5)	

Status: Sent

Platform: Mobile

3/5/2019 5:48:04 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

This will be the absolute last time you make me look like an asshole.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/5/2019 5:49:59 PM(UTC-5)	3/6/2019 6:49:17 AM(UTC-5)	

Status: Sent

Platform: Mobile

3/5/2019 5:49:57 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

There is only so much one person can take and I'm about to snap.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/5/2019 5:55:32 PM(UTC-5)	3/6/2019 6:49:17 AM(UTC-5)	

Status: Sent

Platform: Mobile

3/5/2019 5:55:31 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

WhatsApp Chat - Jaz Bishop

Attachments:



Size: 856788
File name: 8a3c5b09-2d00-4097-a10e-b8da2c694d0f.zip
Path: https://mmg-fna.whatsapp.net/d/f/AjVZKZbVvao6WmxbwBOSx7bplpinG6QQ5cfennybu4qy.enc
8a3c5b09-2d00-4097-a10e-b8da2c694d0f.zip

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/6/2019 3:46:09 AM(UTC-5)	3/6/2019 6:49:17 AM(UTC-5)	

Status: Sent

Platform: Mobile

3/5/2019 9:26:01 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

There is our whole conversation I couldn't have been better to her or you.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	3/6/2019 3:46:09 AM(UTC-5)	3/6/2019 6:49:17 AM(UTC-5)	

Status: Sent

Platform: Mobile

3/5/2019 9:26:59 PM(UTC-5)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

I hate to bother you but you're the only one with the truck Did I leave a bag in there with my make up can you please check

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	4/30/2019 4:10:08 PM(UTC-4)	4/30/2019 4:30:37 PM(UTC-4)	

Status: Sent

Platform: Mobile

4/30/2019 4:10:06 PM(UTC-4)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

Who has the van?!

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	4/30/2019 4:16:12 PM(UTC-4)	4/30/2019 4:30:37 PM(UTC-4)	

Status: Sent

Platform: Mobile

4/30/2019 4:16:11 PM(UTC-4)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

I need my makeup and deodorant

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	4/30/2019 4:16:19 PM(UTC-4)	4/30/2019 4:30:37 PM(UTC-4)	

Status: Sent

Platform: Mobile

4/30/2019 4:16:18 PM(UTC-4)

From: 12159102154@s.whatsapp.net Lisa (owner)
To: 447900171112@s.whatsapp.net Danny Tommo

This shit has to stop. You are making it uncomfortable for everyone. I didn't tell Jaz you messaged me on Twitter when she asked because I don't want anymore drama. Ffs I'm at my limit. I'm well over it although I don't appreciate you going around telling everyone that I was obsessed with you because I wasn't. I just always wanted to help you and I didn't do anything wrong. I thought we were going to put all of this behind us. It's not fair to Tommy.

Seriously. I don't have any hard feelings.

Participant	Delivered	Read	Played
447900171112@s.whatsapp.net Danny Tommo	5/1/2019 5:19:30 PM(UTC-4)	5/1/2019 5:23:34 PM(UTC-4)	

Status: Sent

Platform: Mobile

5/1/2019 4:42:52 PM(UTC-4)

System Message System Message

Missed Voice Call

Platform: Mobile

5/3/2019 7:52:33 PM(UTC-4)

System Message System Message

Missed Voice Call

Platform: Mobile

5/3/2019 7:55:30 PM(UTC-4)

System Message System Message

Missed Voice Call

Platform: Mobile

5/3/2019 8:01:21 PM(UTC-4)

EXHIBIT 105
Messages between
Plaintiff and J.
Bishop

Case 2:19-cv-05030-JDW Document 111-3 Filed 03/02/21 Page 413 of 446
2019-03-07 15:11:16 UTC: 12159102154@s.whatsapp.net ->
[447787051882@s.whatsapp.net]

From: Lisa <12159102154@s.whatsapp.net>
To: Jaz Bishop <447787051882@s.whatsapp.net>
Date: Thu, 07 Mar 2019 10:11:16 -0500

And I didn't know about the money that he took from MEF until you told me. It was always in the back of my mind because it didn't add up and the whole vinney and you thing but he said you were crazy and would do anything to destroy him and I wanted to believe him. Now that I know I'm obligated to tell my work. What do I do? That's theft.

Case 2:19-cv-05030-JDW Document 111-3 Filed 03/02/21 Page 414 of 446
2019-03-07 16:01:57 UTC: 12159102154@s.whatsapp.net ->
[447787051882@s.whatsapp.net]

From: Lisa <12159102154@s.whatsapp.net>
To: Jaz Bishop <447787051882@s.whatsapp.net>
Date: Thu, 07 Mar 2019 11:01:57 -0500

I'm telling tommy about the money.

2019-03-07 16:03:54 UTC: 12159102154@s.whatsapp.net ->
[447787051882@s.whatsapp.net]

From: Lisa <12159102154@s.whatsapp.net>
To: Jaz Bishop <447787051882@s.whatsapp.net>
Date: Thu, 07 Mar 2019 11:03:54 -0500

I knew danny didn't pay him but that unused money wasn't supposed to go to danny at all

**2019-03-07 16:04:43 UTC: 12159102154@s.whatsapp.net ->
[447787051882@s.whatsapp.net]**

From: Lisa <12159102154@s.whatsapp.net>
To: Jaz Bishop <447787051882@s.whatsapp.net>
Date: Thu, 07 Mar 2019 11:04:43 -0500

Thatâ€™s 7 thousand dollars he stole from MEF and Tommy.

**2019-03-10 20:08:52 UTC: 12159102154@s.whatsapp.net ->
[447787051882@s.whatsapp.net]**

From: Lisa <12159102154@s.whatsapp.net>
To: Jaz Bishop <447787051882@s.whatsapp.net>
Date: Sun, 10 Mar 2019 16:08:52 -0400

My work has invested in tommy and now I can't be over there when he is. I'm out of the loop on half of what is going on because danny does the planning. So I can't be there and I'm going to be excluded then so is all the work I do.

**2019-03-10 20:15:01 UTC: 12159102154@s.whatsapp.net ->
[447787051882@s.whatsapp.net]**

From: Lisa <12159102154@s.whatsapp.net>
To: Jaz Bishop <447787051882@s.whatsapp.net>
Date: Sun, 10 Mar 2019 16:15:01 -0400

I have to. That's exactly my point I need a plan if my work gets wind of that Tommy screwed and dandy screwed so we need a plan

**2019-03-10 20:14:41 UTC: 447787051882@s.whatsapp.net ->
[12159102154@s.whatsapp.net]**

From: Jaz Bishop <447787051882@s.whatsapp.net>
To: Lisa <12159102154@s.whatsapp.net>
Date: Sun, 10 Mar 2019 16:14:41 -0400

He told me you was telling Tommy about the money an he didn't give a fuck an you have tryed to hat shit about him to everyone???

**2019-03-10 20:15:07 UTC: 12159102154@s.whatsapp.net ->
[447787051882@s.whatsapp.net]**

From: Lisa <12159102154@s.whatsapp.net>
To: Jaz Bishop <447787051882@s.whatsapp.net>
Date: Sun, 10 Mar 2019 16:15:07 -0400

And I need Danny's bank account and I need the invoices

**2019-03-10 20:16:52 UTC: 12159102154@s.whatsapp.net ->
[447787051882@s.whatsapp.net]**

From: Lisa <12159102154@s.whatsapp.net>
To: Jaz Bishop <447787051882@s.whatsapp.net>
Date: Sun, 10 Mar 2019 16:16:52 -0400

This shit is no joke Jaz

**2019-03-10 20:27:08 UTC: 12159102154@s.whatsapp.net ->
[447787051882@s.whatsapp.net]**

From: Lisa <12159102154@s.whatsapp.net>
To: Jaz Bishop <447787051882@s.whatsapp.net>
Date: Sun, 10 Mar 2019 16:27:08 -0400

A. He owes me a huge fucking apology. I'll let that go. B. If he thinks he's going to fuck my work up he's got another thing coming. I have no romantic feelings for him. As a matter of fact I wish that he would just go away.

2019-03-10 20:29:12 UTC: 12159102154@s.whatsapp.net ->
[447787051882@s.whatsapp.net]

From: Lisa <12159102154@s.whatsapp.net>
To: Jaz Bishop <447787051882@s.whatsapp.net>
Date: Sun, 10 Mar 2019 16:29:12 -0400

No cause I'm not going as of now but I'm afraid my work is going to pull the money and that screws tommy.

**2019-03-10 20:43:49 UTC: 12159102154@s.whatsapp.net ->
[447787051882@s.whatsapp.net]**

From: Lisa <12159102154@s.whatsapp.net>
To: Jaz Bishop <447787051882@s.whatsapp.net>
Date: Sun, 10 Mar 2019 16:43:49 -0400

I do more for tommy then danny ever did. As a matter fact if it wasn't for my company getting involved with Danny's demo they would've never been the way they were and he would've never been involved as he is today

EXHIBIT 106
Messages between
Plaintiff and T.
Robinson.

Also Katie Hopkins was also looking to do a speaking tour for 2020. She mentioned your name. MEF wants to do an event when you are here and the Bridget Gabriel thing sounds very interesting. Let's make this happen.

Check your email. Big donor and friends with Hilary till another huge donor sent a message to our legal team.

MEF is looking to take Facebook to court on your behalf. Thoughts? I'll forward you the emails. Let me know what you think.

I sent the message to Daniel about the legal fund. I will stay on that and the visa stuff. But after all of that I'm going to walk away from all of this. I recently found out some potentially messy things that have to deal with demos MEF and I need to back away until I figure it all out. And if I tell MEF which I think I'm obligated to it's not good. Plus I have jaz harassing me. I'm out.

No. I'm sure you know about the jaz and danny shit. I knew money didn't add up after the first demo but it looks like he kept 7k for himself. If MEF finds out I knew and didn't tell them I'm fucked. If I tell them it's not good for you and future money. It's all so messy. And I don't know what to do.

So MEF gave him 30,000 for the demo. The last one didn't cost that much and look at the difference. He is going to have to get receipts and bank statements.

Looks like you have the green light for MEF legal support. Ezra also got my friend will to cover the event. Amy wants to come to cover it too. Let me know what you need from MEF. you want to put us in contact with your legal team or send a grant for funds. I'm meeting with Daniel today at 4

MEF and DP can always get you in

FYI. For now because of Gregg I'm keeping it quite from MEF.

5 women here including me are suing MEF

It's hard because sometimes I like Daniel I think he such a great guy and I do love MEF's work and all. The Greg is manipulating Daniel and is trying to get all of us out. So we have to protect ourselves

Schedule for tomorrow:

2:00pm your time

OANN W/Jack

Skype: Skype: oandcbureau

3:10pm Radio with MEF

I will call you and conference you in.

3:45 huge radio show. Trump listens. I'll send you info.

4:30 a bigger radio show. Waiting to confirm.

And then I'll leave you alone.

us should be MEFF stuff.

Put in the search bar Tommy robinson. Don't hit an account. Anybody that's mentioned him will show up and look under latest not top

And I didn't know about the money that he took from MEF until you told me. It was always in the back of my mind because it didn't add up and the whole vinney and you thing but he said you were crazy and would do anything to destroy him and I wanted to believe him. Now that I know I'm obligated to tell my work. What do I do? That's theft.

That's 7 thousand dollars he stole from MEF and Tommy.

But not that he got it from the MEF money.

EXHIBIT 107
Message from
Plaintiff to D. Pipes

From: Lisa Barbounis <barbounis@meforum.org>
Sent: Thursday, May 16, 2019 5:02 AM EDT
To: Daniel Pipes <pipes@meforum.org>; Gregg Roman <Roman@meforum.org>
Subject: Fwd: Guardian enquiry re Tommy Robinson

Sending this to just you and Gregg.

I was on I, and requested in writing, a vacation with my family to England and Ireland. I stopped in England to see Tommy and introduce my family to him. I went to 3 of his rallies so they could see what it was like. I am home.

As you know I do occasionally volunteer my time to help him with little things such as answering emails on TR.news and the Press box for votetommyrobinson.com. I use my maiden name specifically to keep things separate.

Neither MEF nor Tommy paid me any money for my official family vacation. That includes travel and accommodation. Anything I have done for Tommy is strictly on a personal volunteer basis.

Resent-From: <Barbounis@meforum.org>
From: Josh Halliday <josh.halliday@theguardian.com>
Date: May 16, 2019 at 3:11:12 AM EDT
To: Daniel Pipes <daniel.pipes@gmail.com>, Gregg Roman <Roman@meforum.org>, Lisa Barbounis <Barbounis@meforum.org>
Subject: Guardian enquiry re Tommy Robinson

Morning all,

I'm getting in touch as we are looking to run a piece on Tommy Robinson's MEP election campaign and I am seeking clarification on the role of Lisa Barbounis, who has been present on the campaign trail for about two weeks. I would be grateful if you could help with the following:

- What is Ms Barbounis' role on Tommy Robinson's campaign?
- Has she provided any advice or other services to the campaign?
- Who funded Ms Barbounis' travel and accommodation costs for her time on the campaign?
- Has the Middle East Forum made any financial or other donation to Tommy Robinson's campaign?
- Is the Middle East Forum still funding Tommy Robinson's legal fees in his ongoing contempt of court case?

I would be grateful for a response by 10pm UK time (6pm EDT) today.

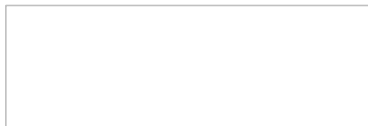
Many thanks,
Josh

--

Josh Halliday
North of England correspondent
Guardian News & Media

josh.halliday@theguardian.com

twitter: [@joshhalliday](https://twitter.com/joshhalliday)



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London N1 9GU
theguardian.com

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EXHIBIT 108
Message from
Plaintiff to T. Giles

2019-03-19 22:11:41 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]

From: Tricia McNulty <" +1 609-742-1968">
To: Home <" +1 215-910-2154">, Home <lisarey@sas.upenn.edu>
Date: Tue, 19 Mar 2019 18:11:41 -0400

Haha don't be! You're going to be amazing and knock it out of the park and walk away with a \$100,000 commission and a year off! _____



U.S. Operation Proposal to Terry Giles From TheRebel.Media

[TheRebel.media](#) is a fearless source of news, opinion, and activism that you won't find anywhere else! TheRebel is different because of how our supporters participate in shaping everything we do. Through a [mix](#) of online engagement, commenting, advocacy, and events, we don't just report the news, we participate in it.

In August of 2018, TheRebel crossed the million-subscriber mark on YouTube. As of December 28th, we have 1,116,236 YouTube subscribers, which is up by 250,034 from 2017. We have more YouTube subscribers than any other news network in Canada, including the CBC state broadcaster, though they have recently poured millions of dollars into marketing their YouTube channel and may catch up before 2019 is over.

The Rebel has 172,000 Facebook followers and 158,000 Twitter followers, and individual Rebel personalities have over 1 million followers on their own social media accounts. The total number of people who have interacted with The Rebel — whether through our social media or through our petitions — is 3,467,182 and growing daily. If Rebel fans were a Canadian province, it would be bigger than Manitoba, Saskatchewan, and Nova Scotia — combined!

However, almost half of the viewers of the Rebel's videos are American, even though we're based in Canada. And that's without really trying — one of our strategic decisions when we launched in 2015 was to stay out of the U.S. market.

But here we are in 2019, and other than Fox News on cable — which is aimed at [older viewers](#), mainly watching on their TV sets — there really isn't a conservative video presence in the U.S. online. The Blaze and CRTV are mainly behind a paywall; the Daily Caller has invested in video, but they haven't yet found their stride; and Breitbart has practically ignored the medium. Infowars was entertaining but was too far out there for many conservatives — and they've been largely de-platformed.



With a bit of effort, and some careful talent recruitment, we could easily ramp up our U.S. presence, while taking advantage of our existing infrastructure, which is mainly located in low-cost Canada (e.g. we pay many of our costs in 75¢ dollars).

TheRebel.media seeks \$1 million to expand our operation in the U.S. We believe that our successful model will continue its success in the U.S. and has the potential to make an impact in the political battles of 2019 and 2020.

With a starting operating budget of \$1 million TheRebel would:

- Invest in U.S. editorial talent
 - A Washington, D.C. reporter, covering politics.
 - Potential talent: Pardes Seleh
 - A southern California-based reporter, ideally with some Spanish language facility, to cover immigration and the wall, including lots of on-the-ground reporting from either side of the border.
 - For example, a Spanish speaker would have been ideal for this project.
 - www.CaravanReports.com
 - Ryan Saavedra of Daily Wire
 - A Silicon Valley-based reporter focused on tech, censorship, privacy and online political bias.
 - Ideal choice would be Allum Bokhari, who currently writes for Breitbart (and is a regular guest on our channel).
 - A political reporter, perhaps New York City, to cover the shift in the Democratic Party
 - The rise of hard-left personalities
 - Alexandria Ocasio-Cortez
 - The 2020 contenders
 - How the election of Ilhan Omar in Minnesota and Rashida Tlaib of Michigan mark the end of the “golden age” for Jews in the Democrats, and how that party is moving away from Israel (and towards outright anti-Semitism) like the UK Labour Party. Canada is a case study in how Jews ended fifty years of voting/donating liberal, when the conservative party embraced Israel and the left renounced it — not only is this important but also very politically fruitful.



- Possibly: an L.A.-based political humorist, in the style of Gavin McInnes, rebutting cultural memes that are churned out by the left
 - https://www.youtube.com/watch?v=Vg_GrEEcS4k
- Possibly: a full-time meme-creator (e.g. shareable Facebook, Instagram and Twitter memes, both still and video)
- At least one U.S.-based assignment editor to manage the U.S. talent, likely based in L.A. or Washington

Cost estimate: talent here is nearly \$500K/year, plus there would be expenses (including occasional freelance cameramen and some equipment).

- **Other U.S. expansion positions**

- PR manager — someone who would pitch our U.S. talent as guests on mainstream TV and radio talk shows, to talk about their Rebel stories
- Possibly the same position: coalitions manager — someone who would push out stories to interested conservative NGOs, politicians, activists, to encourage organic sharing “by tribe”
- U.S. campaigns manager — someone who would work with editorial talent on “social commerce” projects, like booking billboards, commissioning opinion polls, etc.
- Donor development/grant application — someone who would promote the Rebel to U.S.-based foundations and high-value donors, as well as manage any affinity or loyalty programs (using NationBuilder data)
- Legal/compliance — possible position, or budget for contractor lawyers for tax and election compliance, including possible 501(c)3 or 527 SuperPAC structures

Cost estimate: \$350K

- **Talent recruitment**

- Always look for new talent; we believe in non-journalists.

THE REBEL .media

- Internship manager — on the lookout for young talent, especially from campus activists
- Annual student video journalism conference and gala awards night — I've done something like this before: www.JosephHoweInstitute.ca

Cost Estimate: \$150K

That's \$1 million. It would be partly offset by YouTube ads (perhaps \$100,000/year), and hopefully election- and media-focused donors could support much of the rest. Our constant social commerce crowdfunding could work in the U.S., though that would take time to ramp up. But there is no reason why a strong U.S. team couldn't pay for itself in a year.

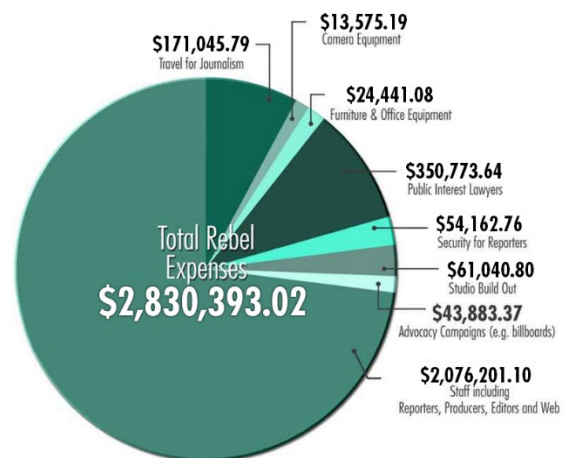
With any additional funding we will set aside a budget for online ads, based on what our detailed analytics suggest are our strengths. That could require a manager and we would consider a full-time e-mail writer to promote social commerce.

We would replicate the Rebel's already successful business model which is outlined below.

How TheRebel.media Crowdfunds

Unlike most Canadian media, The Rebel is an independent start-up that receives no government funds whatsoever. It relies on a crowdfunding model, where thousands of ordinary people support it through small contributions. No single donor has given more than 2% of the Rebel's funds. The average gift is \$63.

The Rebel does two types of crowdfunding: crowdfunding for its own business operations and campaigns, and crowdfunding for external charities.



Internal crowdfunding includes annual capital campaigns, equipment, studios, apps and general

June 2017 - May 2018



support. It also covers specific projects, like public interest legal work, political issue campaigns, and journalistic travel. It also supports the hiring of journalistic staff, including student interns.

In the past fiscal year, the Rebel has crowdfunded \$2.245 million for these business operations, which nearly covers the \$2.830 million in expenses associated with those costs. Rebel's crowdfunding terms of service direct that if a particular project is oversubscribed, funds may be put towards the overhead associated with that project, or to similar projects. We call this process "social commerce"; others call it "pay it forward". It's how the Rebel pays the bills.

In addition to crowdfunding its own business operations, the Rebel also crowdfunds for selected bona fide charities. This is done on third-party crowdfunding websites like Indiegogo and Generosity.com for maximum transparency. 100% of the net proceeds from these third-party sites is passed on to the recipient, with no other Rebel expenses claimed.



June 2017 - May 2018

In addition, in 2018 we crowdfunded the legal fees for Tommy Robinson's successful judicial appeal in the UK. For reasons of solicitor-client privilege, we will not disclose the amount of those funds, but they have been disbursed as per the terms [outlined in this video](#).

EXHIBIT 109

Memo from Plaintiff

MIDDLE EAST FORUM

MEMORANDUM

TO: Dr. Pipes, Gregg
FROM: Lisa Barbounis
DATE: <AUTODATE>
SUBJECT: England trip

My main activity was meeting with the Tommy Robinson team to discuss TR future plans for his trip to the US, his US visa, upcoming projects in the UK and subsequent court cases. I also had time to fit in meetings with a journalist, foreign correspondent, and a potential donor.

Tommy Robinson

The meeting took place at the Four Seasons Hotel in London from 3:00pm until 7:30pm.

Present in the meeting:

Tommy, Tommy's two solicitors - John Carson and John Kaye

UKIP advisor Peter Mcilvenna

Terry Giles

Ezra showed up toward the end of the meeting to discuss his involvement.

Terry is actively working with Senator Cruz to advance Tommy's visa. He is mainly concerned with bringing Tommy and his family to Houston, by getting a visa; getting them into a new house/school/life; and getting him onto the speaking circuit, including evangelical churches. However, the current charges, although civil as opposed to criminal, still carry the potential of jail time which impedes the visa process.

The solicitors informed us that there is an option to settle with "time served" but Tommy is against taking that route, on principle, and wants to fight the charges. We all agreed that to get the outstanding charges from hanging over Tommy's head and to advance our collective plans for him in the US he should try to settle. Tommy seemed reluctant but said he would think it over.

On May 3rd there will be a hearing to see if the Attorney General's decision to proceed to trial will be accepted by the courts. Carson said that any other case would be thrown out at this stage but because it is "Tommy" they anticipate it proceeding to trial.

Terry asked to be an official advisor on the case, and they granted him access to the entire file so that he may report back to Homeland Security.

We briefly spoke about a potential Facebook suit. Tommy had new information about how to get around Facebook censorship. Because of the conflict in Northern Ireland discriminating against political beliefs is illegal. He plans to open some type of operation – TR.news Northern Ireland and reopen a Facebook page once that is complete. If he gets banned again at that point, he can also take advantage of Ireland's discrimination laws.

Terry Giles

[Background on Terry Giles - <https://www.texastribune.org/2015/01/22/ben-carsons-campaign-chairman-has-colorful-career/>]

Although his specific interest is getting Tommy Robinson to America his general interest is in ringing the alarm about radical Islam (and having Tommy as a voice in America to do that).

Peter Mcilvenna says that Mr. Giles was concerned about the larger issue of Islam before he met Tommy; so, he is obviously not just 100% Tommy focused. That could mean he's interested in supporting MEF in general.

I spent an hour with Mr. Giles and UKIP advisor Peter Mcilvenna. Peter and I have now met several times before during UKIP meetings. He was the person who introduced Mr. Giles to Tommy.

Giles was very interested in my educational/career background and relationship to Tommy. I spent about 30 minutes telling him about MEF and our projects, staff and fellows. He said that he thinks Tommy could have a big impact in the US in warning citizens about the threats of Islam. He said he is worried that should Tommy gain more notoriety that "his personality may change". I said that I didn't think that would be the case to which he oddly replied, "I saw it happen with Ben Carson."

He said he was impressed with me and the work of MEF and that if Tommy does make it to America, he hopes that I would head up Tommy's team here to insure others don't use Tommy and he doesn't lose his authenticity.

He sent me a follow up email thanking me.

"It was a pleasure meeting you in person last Friday. Thank you for all you are doing for Tommy and his family. He clearly holds you in high regard."

The next time we do an event in Texas he should absolutely be invited.

Matt Bradley

Matt Bradley is a foreign correspondent for Matt Bradley of MSNBC and NBC News in London. We met for coffee in London.

Bradley has previously quoted Aymenn but was less familiar with MEF. I went over all our projects, fellows and Dr. Pipes. He was most impressed with Pipes and said he would be interested in quoting him in his work. We said that we would keep in touch and he would reach out if he needed a quote or information and I should pass along anything that I have that would be of interest to him.

David Kirkpatrick

David is a journalist for the NY Times in London. We met for coffee. Again, I went over all our projects, fellows and Dr. Pipes. He is very interested in our work and we agreed to keep in touch.

EXHIBIT 110
Message from D.
Pipes

From: Daniel Pipes <pipes@meforum.org>
Sent: Tuesday, March 26, 2019 2:25 PM EDT
To: Lisa Barbounis <Barbounis@meforum.org>
CC: Gregg Roman <Roman@meforum.org>
Subject: Re: memo on my England trip

This message was sent from outside the company by someone with a display name matching a user in your organisation. Please do not click links or open attachments unless you recognise the source of this email and know the content is safe.

Thanks for the report.

It's all good with the very substantial exception of helping Tommy Robinson come to the United States, which I am very, very much against. He has a potential leadership role in the UK - he's already advisor to the head of UKIP and I've heard talk of his running for MEP in case Brexit does not happen - which cannot be replicated in the United States. Without riling up Mr Giles, please do not be party to this effort and please do convey to TR my strong view that he should not quit the UK.

EXHIBIT 111
Message from
Plaintiff to D. Pipes

From: Lisa Barbounis <barbounis@meforum.org>

Sent: Tuesday, March 26, 2019 2:36 PM EDT

To: Daniel Pipes <pipes@meforum.org>

Subject: Re: memo on my England trip

I also advised against him coming permanently to the US. Once he realized that he couldn't go back to the UK if he declared asylum he was much less interested.

I'm meant doing a speaking tour here is what I'm interested in. Not moving here permanently. I should have been more clear.

On Mar 26, 2019, at 2:25 PM, Daniel Pipes <pipes@meforum.org> wrote:

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Thanks for the report.

It's all good with the very substantial exception of helping Tommy Robinson come to the United States, which I am very, very much against. He has a potential leadership role in the UK - he's already advisor to the head of UKIP and I've heard talk of his running for MEP in case Brexit does not happen - which cannot be replicated in the United States. Without riling up Mr Giles, please do not be party to this effort and please do convey to TR my strong view that he should not quit the UK.

EXHIBIT 112
Plaintiff's
Correspondence with
A. Mekelburg

Re: Master GOS Report and Proposal

From: "amy mek <amymek@gmail.com>"
To: "[\"]lisa barbounis <lisabarbounis@gmail.com>\""]"
Date: Thu, 11 Apr 2019 04:33:20 -0400

Thank you!!! xxxxxx

I sent you access to the document.

On Wed, Apr 10, 2019 at 8:24 PM Lisa Barbounis <lisabarbounis@gmail.com> wrote:

Sent from my iPhone

Begin forwarded message:

From: Lisa Barbounis <Barbounis@meforum.org>
Date: April 10, 2019 at 8:23:21 PM EDT
To: "[\"]lisabarbounis@gmail.com" <lisabarbounis@gmail.com>
Subject: Fwd: Master GOS Report and Proposal


[Get Outlook for iOS](#)

From: Lisa Barbounis
Sent: Wednesday, April 10, 2019 10:20:41 AM
To: Tricia McNulty
Subject: FW: Master GOS Report and Proposal

EXHIBIT 113

Tweet from Plaintiff



 **Meredith in Rotherham**

 @MerEDITH_TrUTH · Apr 12

Replying to @GenuineRebel @MikeStuchbery

Lisa Reynolds Barbounis is the Director of Communications for the Middle East Forum (they also have an office in Jerusalem). I suspect their bigger agenda is for TR to hijack Ukip to disseminate anti Muslim sentiment.

Has the MEF donated to Ukip? We need full disclosure.

